

EPA Registration No.
4787-26
Vol. 2



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

NOV 29 2007

**OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES**

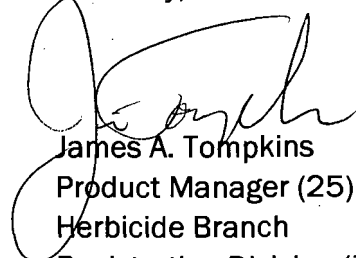
Ms. Carrie M. Tackema
Regulatory Specialist
Cheminova Inc.
Oak Hill Park
1700 Route 23, Suite 300
Wayne, New Jersey 07470

Dear Ms. Tackema:

Subject: Glyphosate Technical
Review of Basic Confidential Statement of Formula (CSF)
EPA Registration No. 4787-26
Submission Dated: November 7, 2007

The amendment referred to above, submitted in connection with registration under the Federal Insecticide Fungicide and Rodenticide Act (FIFRA), as amended is acceptable. The Confidential Statement of Formula dated 11/07/07 has been added to your record as current and updated and supersedes all basic CSFs on file.

Sincerely,


James A. Tompkins
Product Manager (25)
Herbicide Branch
Registration Division (7505P)



Cheminova, Inc.
Oak Hill Park
1700 Route 23, Suite 300
Wayne, New Jersey 07470

Phone: 973-305-6600
Fax: 973-305-1382
Customer service:
1-800-548-6113

Via Courier Delivery

November 7, 2007

Mr. James A. Tompkins, PM25
Herbicide Branch
Office of Pesticide Programs
Document Processing Desk (AMEND)(7504P)
U.S. Environmental Protection Agency
One Potomac Yard
Room S4900
2777 S. Crystal Drive
Arlington, VA 22202

Contains Confidential Business Information

RE: **Glyphosate Technical (EPA Reg. No. 4787-26)
Basic Confidential Statement of Formulation (CSF) Amendment**

Dear Mr. Tompkins:

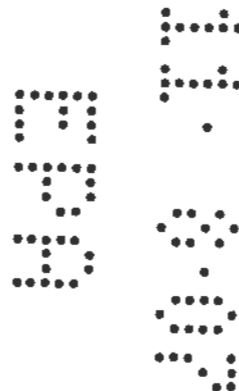
In response to your letter dated October 22, 2007 (attached), please be advised that we have corrected the typographical error in box 4 and replaced 4787-35 with 4787-36. The revised Basic Confidential Statement of Formulation is attached for your review.

If you should have any questions or require additional information, please contact me directly at (973) 305-6600 Ext. 229 or by email at cmt.us@cheminova.com.

Sincerely,

Carrie M. Tackema
Regulatory Specialist

Enclosures





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OCT 22 2007

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Ms. Diane Allemang
Vice President, Regulatory Affairs
Cheminova Inc.
Washington Office
1600 Wilson Boulevard
Suite 700
Arlington, VA 22209

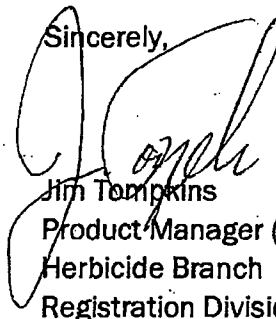
Dear Ms. Allemang:

Subject: Glyphosate Technical
Basic Confidential Statement of Formula (CSF) Amendment
EPA Registration No. 4787-26
Submission Dated: June 27, 2007

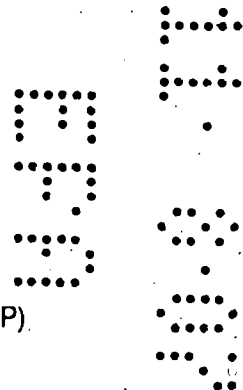
The amendment referred to above, submitted in connection with registration under the Federal Insecticide Fungicide Act (FIFRA), as amended is acceptable with comment. Please correct the typographical error in box 4 and replace 4787-35 with 4787-26 and resubmit to the Agency for review.

The Confidential Statement of Formula (CSF) dated 06/22/07 has been added to your record as current and updated. All other Basic Confidential Statements of Formula are obsolete.

Sincerely,



Jim Tompkins
Product Manager (25)
Herbicide Branch
Registration Division (7505P)





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OCT 22 2007

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Ms. Diane Allemang
Vice President, Regulatory Affairs
Cheminova Inc.
Washington Office
1600 Wilson Boulevard
Suite 700
Arlington, VA 22209

Dear Ms. Allemang:

Subject: Glyphosate Technical
Basic Confidential Statement of Formula (CSF) Amendment
EPA Registration No. 4787-26
Submission Dated: June 27, 2007

The amendment referred to above, submitted in connection with registration under the Federal Insecticide Fungicide Act (FIFRA), as amended is acceptable with comment. Please correct the typographical error in box 4 and replace 4787-35 with 4787-26 and resubmit to the Agency for review.

The Confidential Statement of Formula (CSF) dated 06/22/07 has been added to your record as current and updated. All other Basic Confidential Statements of Formula are obsolete.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Tompkins", written over a circular stamp.

Jim Tompkins
Product Manager (25)
Herbicide Branch
Registration Division (7505P)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OCT 22 2007

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Ms. Diane Allemang
Vice President, Regulatory Affairs
Cheminova Inc.
Washington Office
1600 Wilson Boulevard
Suite 700
Arlington, VA 22209

Dear Ms. Allemang:

Subject: Glyphosate Technical
Label Amendment
EPA Registration No. 4787-26
Submission Dated: June 27, 2007

The labeling referred to above, submitted in accordance with registration under the Federal Insecticide, Fungicide, and Rodenticide act, as amended is acceptable. A stamped copy of the labeling is enclosed for your record.

Sincerely,

A handwritten signature in black ink, appearing to read "James A. Tompkins", written over the typed name and title.

James A. Tompkins
Product Manager (25)
Herbicide Branch
Registration Division (7505P)

Glyphosate Technical

For Manufacturing Use Only

ACTIVE INGREDIENT (dry basis):

Glyphosate, (Glycine, N-(phosphonomethyl)-),

OTHER INGREDIENTS (dry basis):

TOTAL:



**KEEP OUT OF REACH CHILDREN
DANGER**

FIRST AID

IF SWALLOWED: -Call a poison control center or doctor immediately for treatment advice.
-Have person sip a glass of water if able to swallow.
-Do not induce vomiting unless told to by poison control center or doctor.
-Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING:

-Take off contaminated clothing.
-Rinse skin immediately with plenty of water for 15-20 minutes.
-Call a poison control center or doctor for treatment advice.

IF IN EYES:

-Hold eye open and rinse slowly and gently with water for 15-20 minutes.
-Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.
-Call a poison control center or doctor for treatment advice.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

IN CASE OF A MEDICAL EMERGENCY, CALL TOLL FREE DAY OR NIGHT, 1-866-303-6950

See side panel for additional precautionary statements.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

KEEP OUT OF REACH OF CHILDREN

DANGER

Corrosive. Causes irreversible eye damage. Harmful if absorbed through skin. Do not get in eyes or on clothing. Avoid contact with skin. Wear goggles or face shield. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

ENVIRONMENTAL HAZARDS

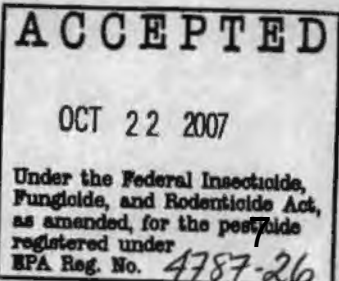
Do not contaminate water when cleaning equipment or disposing of wastes.

The active ingredient in this product is a non-selective broad spectrum herbicide. Do not handle or use in a manner that can result in accidental contact with desirable vegetation.

EPA Reg. No.: 4787-26

EPA Est. No.:

Manufactured for



CHEMINOVA A/S
P.O. Box 9
DK-7620 LEMVIG, DENMARK

Net Contents: ____ gallons (____ liters)

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

For use by commercial pesticide formulators.

For formulation into end-use herbicide products intended for the following uses:

(1) Fallow ground, pastures and sods, noncrop areas including: rights of way, industrial, recreational and public areas, forestry site preparation and release programs, site preparation or directed sprays to the floor of ornamental nurseries and Christmas tree farms, rights of way (ROW), Conservation Reserve Program (CRP), turfgrasses and grasses for seed production;

Residential sites:

Row Crops: corn, cotton, peanuts, sorghum, soybeans, sugarcane, barley, buckweat, millet, oats, rice, rye, triticale, wheat, wild rice;

Citrus: Calamondin, chironja, citron, grapefruit, kumquat, lemon, lime, mandarin orange, orange, pummelo, tangelo, tangerine, tangors;

Tree Nuts: almond, beechnut, Brazil nut, butternut, cashew, chestnut, chinquapin, filbert (hazelnut), hickory nut, macadamia nut, pecan, pistachio, walnut;

Vine Crops: grapes and kiwi fruit;

Tree Fruits: apple, apricot, cherry, loquat, mayhaw, nectarine, olive, peach, pear, plum/prune, quince;

Vegetables: artichoke (Jerusalem), asparagus, beans, (all), beet greens, beets (red, sugar), broccoli (all), Brussels sprouts, cabbage (all), cabbage (Chinese), cantaloupe, carrot, cauliflower, casaba melon, celery, chard (Swiss), chicory, collards, crenshaw melon, cucumber, eggplant, endive, garlic, gourds, ground cherry, honeydew melon, honey ball melon, horseradish, kale, kohlrabi, leek, lentils, lettuce, mango melon, melons, muskmelon, mustard greens, okra, onion, rape greens, parsley, parsnips, peas (all), pepper (all), Persian melon, potato (Irish and sweet), pumpkin, radish, rhubarb, spinach, squash, tomatillo, tomato, turnip, watercress, watermelon, yams;

Small Fruits and Berries: blackberry, blueberry, boysenberry, cranberry, currant, dewberry, elderberry, gooseberry, huckleberry, loganberry, olallieberry, raspberry;

Forage Crops: alfalfa, forage grasses, forage legumes;

Tropical Crops: acerola, atemoya, avocado, banana (plantains), breadfruit, canistel, carambola, cherimoya, cocoa beans, coffee, dates, figs, genip, guava, jaboticaba, jackfruit, longan, lychee, mango, papaya, passion fruit, persimmons, pineapple, pomegranate, sapodilla, sapote (black, mamey, white) soursop, sugar apple, tamarind, tea;

(2) Uses for which the USEPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration; and

(3) Uses for experimental purposes that are in compliance with USEPA requirements.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage and disposal.

Pesticide Storage: Store in original container only. Do not store near heat or open flame. In case of spill or leak, sweep up and dispose of waste.

Pesticide Disposal: Open dumping is prohibited. Waste resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Disposal: Triple rinse (or equivalent). Then offer for recycling, or dispose of in a sanitary landfill or by other procedures approved by state and local authorities.

WARRANTY DISCLAIMER

Cheminova warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in strict accordance with the directions, subject to the inherent risks set forth below. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, CHEMINOVA MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR ANY OTHER EXPRESS OR IMPLIED WARRANTY.

INHERENT RISKS OF USE

It is impossible to eliminate all risks associated with use of this product. Unintended consequences may result because of factors such as use of the product contrary to label instructions, which are beyond the control of Cheminova or the Seller. Cheminova and the Seller shall not be responsible for any risks caused by the incorporation of this product into an end use product by the Buyer or User. Buyer is solely responsible for any risks created by the end use or uses to which Buyer or a User put this product. All of the foregoing risks shall be assumed by Buyer and User, and Buyer and User agree to hold Cheminova and Seller harmless for any claims related to such factors.

LIMITATION OF REMEDIES

To the extent consistent with applicable law, the exclusive remedy for losses or damages resulting from this product (including claims based on contract, negligence, strict liability, or other legal theories), shall be limited to one of the following, at Cheminova's election:

(1) Refund of purchase price paid by buyer or user for product bought, or

(2) Replacement of amount of product used.

In no case shall Cheminova be liable for consequential, incidental, or special damages or losses.

The terms of the Warranty Disclaimer above and this Limitation of Remedies cannot be varied by any written or verbal statements or agreements. No employee or sales agent of Cheminova or the Seller is authorized to vary or exceed the terms of the Warranty Disclaimer or this Limitation of Remedies in any manner.

DLD

EPA

9 25 00

Glyphosate Technical

For Manufacturing Use Only

ACTIVE INGREDIENT:

Glyphosate, (Glycine, N-(phosphonomethyl)-),

98.3%

OTHER INGREDIENTS:

1.7%

TOTAL:

100.0%

KEEP OUT OF REACH CHILDREN.

DANGER

FIRST AID

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

IF SWALLOWED: -Call a poison control center or doctor immediately for treatment advice.

-Have person sip a glass of water if able to swallow.

-Do not induce vomiting unless told to by poison control center or doctor.

-Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING:

-Take off contaminated clothing.

-Rinse skin immediately with plenty of water for 15-20 minutes.

-Call a poison control center or doctor for treatment advice.

IF IN EYES:

-Hold eye open and rinse slowly and gently with water for 15-20 minutes.

-Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.

-Call a poison control center or doctor for treatment advice.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

IN CASE OF A MEDICAL EMERGENCY, CALL TOLL FREE DAY OR NIGHT, 1-800-228-5635, EXT. 153

ACCEPTED

NOV 30 2000

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under
EPA Reg. No. 4797-26

See side panel for additional precautionary statements.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

KEEP OUT OF REACH OF CHILDREN

DANGER

Corrosive. Causes irreversible eye damage. Harmful if absorbed through skin. Do not get in eyes or on clothing. Avoid contact with skin. Wear goggles or face shield. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

OLD

EPA

ENVIRONMENTAL HAZARDS

Do not contaminate water when cleaning equipment or disposing of wastes.

The active ingredient in this product is a non-selective broad spectrum herbicide. Do not handle or use in a manner that can result in accidental contact with desirable vegetation.

EPA Reg. No.: 4787-26

EPA Est. No.: 4787-DN-1

Manufactured by
CHEMINOVA A/S
P.O. Box 9
DK-7620 LEMVIG, DENMARK

Net Contents: ____ gallons (____ liters)

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

For use by commercial pesticide formulators.

For formulation into end-use herbicide products intended for the following uses:

(1) Fallow ground, pastures and sods, noncrop areas including: rights of way, industrial, recreational and public areas, forestry site preparation and release programs, site preparation or directed sprays to the floor of ornamental nurseries and Christmas tree farms, rights of way (ROW), Conservation Reserve Program (CRP), turfgrasses and grasses for seed production;

Residential sites:

Row Crops: corn, cotton, peanuts, sorghum, soybeans, sugarcane, barley, buckweat, millet, oats, rice, rye, triticale, wheat, wild rice;

Citrus: Calamondin, chironja, citron, grapefruit, kumquat, lemon, lime, mandarin orange, orange, pummelo, tangelo, tangerine, tangors;

Tree Nuts: almond, beechnut, Brazil nut, butternut, cashew, chestnut, chinquapin, filbert (hazelnut), hickory nut, macadamia nut, pecan, pistachio, walnut;

Vine Crops: grapes and kiwi fruit;

Tree Fruits: apple, apricot, cherry, loquat, mayhaw, nectarine, olive, peach, pear, plum/prune, quince;

Vegetables: artichoke (Jerusalem), asparagus, beans, (all), beet greens, beets (red, sugar), broccoli (all), Brussels sprouts, cabbage (all), cabbage (Chinese), cantaloupe, carrot, cauliflower, casaba melon, celery, chard (Swiss), chicory, collards, crenshaw melon, cucumber, eggplant, endive, garlic, gourds, ground cherry, honeydew melon, honey ball melon, horseradish, kale, kohlrabi, leek, lentils, lettuce, mango melon, melons, muskmelon, mustard greens, okra, onion, rape greens, parsley, parsnips, peas (all), pepper (all), Persian melon, potato (Irish and sweet), pumpkin, radish, rhubarb, spinach, squash, tomatillo, tomato, turnip, watercress, watermelon, yams;

Small Fruits and Berries: blackberry, blueberry, boysenberry, cranberry, currant, dewberry, elderberry, gooseberry, huckleberry, loganberry, olallieberry, raspberry;

DATA PACKAGE BEAN SHEET

Date: 26-Jul-2007

Page 1 of 2

Decision #: 380893

DP #: (341985)

PRIA

Parent DP#:

*** Registration Information ***

Registration: 4787-26 - GLYPHOSPHATE TECHNICAL

Company: 4787 - CHEMINOVA A/S

Risk Manager: RM 25 - James Tompkins - (703) 305-5697 Room# PY1 S-7337

Risk Manager Reviewer: Juanita Gilchrist JGILCHR

Sent Date:

Calculated Due Date: 15-Nov-2007

Edited Due Date:

Type of Registration: Product Registration - Section 3

Action Desc: (R34) NON-FAST-TRACK (INCLUDES CHANGES TO PRECAUTIONARY LABEL STATEMEN

Ingredients: 417300, Glyphosate(98.3%)

R34
#22003

*** Data Package Information ***

Expedite: ☐ Yes ☒ No

Date Sent: 26-Jul-2007

Due Back:

DP Ingredient: 417300, Glyphosate

DP Title:

CSF Included: ☒ Yes ☐ No

Label Included: ☒ Yes ☐ No

Parent DP #:

Assigned To

Date In

Date Out

Organization: RD / TRB / CHEM

Last Possible Science Due Date: 16-Oct-2007 ✓

Team Name: Chemistry

Science Due Date:

Reviewer Name: Sami Malak

10/10/07

10/16/07

Sub Data Package Due Date:

Contractor Name:

*** Studies Sent for Review ***

Printed on Page 2

*** Additional Data Package for this Decision ***

No Additional Data Packages

*** Data Package Instructions ***

Pls review CSF and Product Chem Data in support of new Alt Source for Nominal.
MRID 47187701

Thanks, Juanita 305-6965

FEE

DATE OUT: 16/OCT/2007

FEE: PRODUCT CHEMISTRY REVIEW OF: A TECHNICAL GRADE TGAI [X]

DPBARCODE #: D341985 EPA RECEIVED DATE: 26/JUL/2007 REG NO: 4787-26

PRODUCT NAME: Glyphosate Technical FOOD USES [X] MRID: 471677-01

COMPANY NAME: Cheminova A/S ACTION CODE: R34

PPC NUMBER OF THIS TGAI: 417300 DECISION No.: 380893

FROM: Sami Malak, Chemist
Technical Review Branch/RD (7505P)

TO: 25 James Tompkins/Juanita Gilchrist
Herbicide Branch/RD (7505P)

INTRODUCTION:

In a letter dated 27/JUN/2007 the applicant requested registration of subject product and to allow its manufacturing in Denmark or China. In support of this application, the applicant included product chemistry data, a basic CSF dated 22/JUN/2007, a proposed label EPA received on 27/JUN/2007, Certificate With Respect With Citation of Data, Data Matrix, and a letter authorizing the applicant to rely on Monsanto's data pertaining to glyphosate. The current basic CSF dated 20/APR/1995 and label accepted on 30/NOV/2000, were included with this submission.

FINDINGS:

1. Glyphosate technical was manufactured by the applicant in Denmark and China. The product, CAS #1071-83-6, is 98% pure in the form of N-(phosphonomethyl)glycine to be claimed in the submitted basic CSF dated 22/JUN/2007. The current production, by the applicant, is in Denmark, 98.3% pure, CSF dated 20/APR/1995.
- 2a. The submitted basic CSF reflecting manufacturing of subject product by the applicant in Denmark or China is substantially similar in composition to the current basic CSF dated 20/APR/1995 manufactured by the applicant in Denmark: Exceptions [REDACTED]
[REDACTED]
[REDACTED]
- 2b. Deferral to TOX/HED may be needed for their assessment as to the toxicological significance of [REDACTED] impurities (refer to NOTE to RM at the end of Confidential Appendix A).
3. The subject product, a herbicide TGAI, is intended for formulating end-use products for use on crops.
- 4a. Adequate analytical method for the TGAI is available for enforcement. The method was previously submitted and reviewed in connection with registration of subject product.

Manufacturing process information may be entitled to confidential treatment

- 2 -

HPLC analytical methods for the PAI and [REDACTED] impurities were described in this submission, MRID #471677-01. The methods are reviewed in this memorandum.

- 4b. No need for submittal of samples and the analytical method to EPA's laboratory for validation.
5. The submitted product chemistry data are adequate and support registration of subject product.
6. The label claim nominal concentration of 98% glyphosate is consistent with that in the submitted basic CSF dated 22/JUN/2007 and both are in compliance with the regulations of PR Notice 91-2. Further, the storage and disposal statement and the physical or chemical hazards statement are in compliance with the regulations of 40CFR§156.78.
7. The submitted basic CSF dated 22/JUN/2007 was filled out correctly and completely and agree with the label nominal concentration as per the regulations of PR Notice 91-2. Further, the upper and lower certified limits of associated ingredients are within the standard limits of 40CFR§158.175(b)(2). All ingredients claimed in the CSFs are cleared for use in pesticide formulations intended for food uses.

CONCLUSIONS:

The TRB has no objections for registration of subject product and to allow its manufacturing in Denmark or China. The submitted basic CSF dated 22/JUN/2007 and label EPA received on 27/JUN/2007 are acceptable as per Findings 6 & 7 above. They must supersede the current CSF dated 20/APR/1995 and label approved on 30/NOV/2000.

NOTE TO RM:

Please note Finding 4(b) above, also refer to NOTE TO RM at the end of Confidential Appendix A.

REVIEW OF PRODUCT CHEMISTRY DATA:

1. A statement of data confidentiality dated 27/JUN/2007 was included with this submission claiming confidentiality of some of the submitted data on the basis of its falling within the scope of FIFRA§10(d)(1)(A), (B), or (C). Review of this data was moved to Confidential Appendix A.
2. A GLP statement dated 27/JAN/2007 was included with this submission to the effect that the submitted studies were conducted in compliance with the GLP requirements of 40CFR§160.

- 3 -

830-1800 Enforcement Analytical Method:

Adequate analytical methods for the TGAI is available for enforcement. The method was previously submitted and reviewed in connection with registration of subject product. HPLC analytical methods for the PAI and [REDACTED] impurities were included with this submission, MRID #471677-01. The methods were described in details and each received extensive validation by the company. No need for submittal of samples and the analytical method to EPA's laboratory for validation.

Method validation data regarding recovery, accuracy, precision, and linearity are adequate. Sample calculations and chromatograms were included with this submission.

Chemical Name (CAS; IUPAC, ANSI, etc.)	N-(phosphonomethyl)glycine
Chemical Numbers (CAS; PC Code)	Reg. No. 4787-26 CAS NO. 1071-83-6 PC Code: 417300
Registration/Symbol No.:	4787-26
Type of Product (T, FI, MP, EP)	98% T
DP Barcode	Dp #341985
Reviewer	Sami Malak, Ph.D

The applicant has submitted the following MRIDs of product chemistry data: Group A, Series 830-Product Identity, Composition, and Analysis (40 CFR 155, 160, 162, 167, 175 & 180)

Table 1: Manufacturing and Impurity Data for: N-(phosphonomethyl)glycine				
GRN	Requirement	MRID	Status ¹	Details and/or Deficiency ²
830.1550	Product Identity & Disclosure of Ingredients	471677-01	A	For product identity refer to text below. For product's composition refer to Confidential Appendix A for details.
830.1600 830.1620	Starting Materials & Manufacturing Process	471677-01	A	Refer to Confidential Appendix A for details.
830.1670	Discussion of Impurities	471677-01	A	Refer to Confidential Appendix A for details.
830.1700	Preliminary Analysis	471677-01	A	Refer to Confidential Appendix A for details.
830.1750	Certification of Limits	471677-01	A	Refer to Confidential Appendix A for details.
830.1800	Analytical Methods	471677-01	A	Refer to text for details
¹ A = Acceptable; N = Unacceptable (see Deficiency); N/A = Not Applicable. ² Refer to CBI Appendix A for details.				

830.1550 Product Identity:

Chemical Name: N-(phosphonomethyl)glycine

CAS Registry No.: 1071-83-6

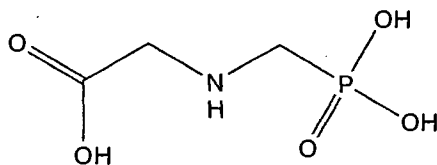
Common Name: Glyphosate Technical

Class: Herbicide

Empirical Formula $C_3H_8NO_5P$

Molecular Weight: 169.07

Chemical Structure:



830-1600 Description of Materials Used to Produce the Product: Refer to Confidential appendix A.

830-1620 Description of Production Process: Refer to Confidential appendix A

830-1620 Discussion of Formation of Impurities: Refer to Confidential appendix A

830-1700 Preliminary Analysis: Refer to Confidential appendix A

830-1750 Certified Limits: Refer to Confidential appendix A

Physical and Chemical Properties, Subgroup B, Series 830.6302 to -830.7300 (40 CFR 158.190)

No data was included with this submission. The applicant must have relied on the current properties previously reviewed for subject product.

Attachment:

Confidential Appendix A (pages 5 to 14).

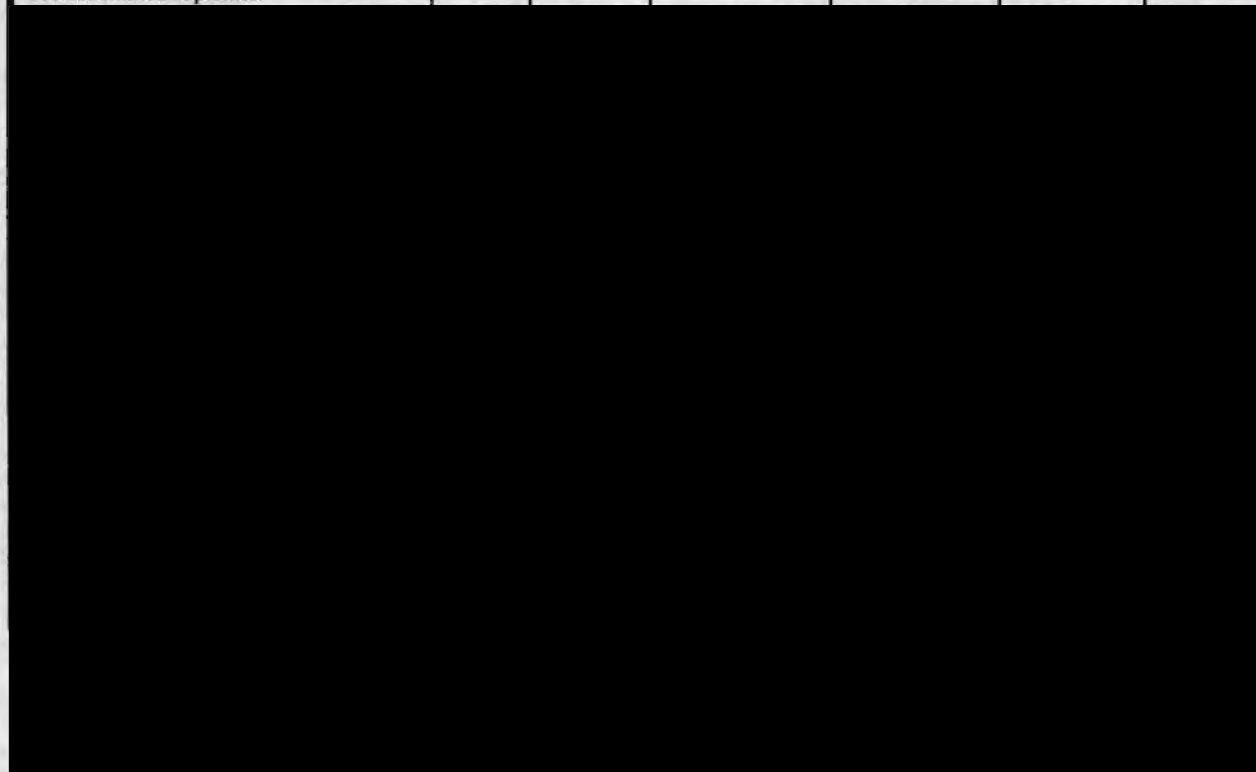
CONFIDENTIAL APPENDIX A: MANUFACTURING, COMPOSITION, AND IMPURITY INFORMATION

Chemical: Glyphosate Technical	Registration Number: 4787-26	DP Barcode: 341985
CAS Numbers 1071-83-6	Product Type: Herbicide	Test Substance: TGAI
Chemical Name: N-(phosphonomethyl) glycine		

*Group A - GRNs 830.1550; 830.1600; 830.1620; 830.1670; 830.1700; and 830.1750
Composition (CSF), Materials used to produce the product, Production process, Discussion of Formation of Impurities, Preliminary Analysis, and Certified limits:*

GRN 830.1550 Product Composition:

Compound/Component ¹			Nominal Concentration (% w/w)	Upper Certified Concentration (% w/w)	Lower Certified Concentration (% w/w)	Preliminary Analysis (% w/w) ³	Mean \pm r.s.d. (%)
No.	Name	Type ²					
1	Glycine, N-(phosphonomethyl)-glycine	A	98.00	100	96	98.00	Not reported
Process Related Impurities:							



Manufacturing process information may be entitled to confidential treatment

830-1700 Preliminary Analysis:

Five batch analysis were performed in duplicate on glyphosate technical. The applicant reported the same ingredients, nominal concentrations, and upper/lower limits as those reported in the table under product identity, GRN 830.1550.

830-1750 Certified Limits:

The applicant reported the same certified limits as those found in duplicate analysis of five batches of glyphosate technical as reported in the table under product identity, GRN 830.1550.

NOTE TO RM:

Deferral to TOX/HED may be needed for their assessment as to the toxicological significance of [REDACTED] *basic*
[REDACTED] impurities [REDACTED]
[REDACTED]



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460**

July 12, 2007

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

CHEMINOVA A/S
1600 WILSON BLVD., SUITE 700
ARLINGTON, VA 22209-2510

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 27-JUN-07. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

July 5, 2007

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

PLEASE RETURN A COPY OF THIS LETTER WITH PAYMENT
OR PAY ON-LINE at www.Pay.Gov (See Below for Details)

OPP Decision Number: D-380893
EPA File Symbol or Registration Number: 4787-26
Product Name: GLYPHOSPHATE TECHNICAL
EPA Receipt Date: 27-Jun-2007
EPA Company Number: 4787
Company Name: CHEMINOVA A/S

DIANE ALLEMANG
CHEMINOVA INC.
CHEMINOVA A/S
1600 WILSON BLVD., SUITE 700
ARLINGTON, VA 22209-2510

SUBJECT: Receipt of Amendment Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your application for Amendment. If you submitted data with this application, the results of the PRN-86-5 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R34

NON-FAST-TRACK (INCLUDES CHANGES TO PRECAUTIONARY LABEL
STATEMENTS; SOURCE CHANGES TO AN UNREGISTERED SOURCE);

Please remit payment in the amount of: \$ 3,150 to:

By USPS:
USEPA Washington Finance Center
Pesticide Registration Service Fee
PO Box 360277
Pittsburgh, PA 15251

By Courier:

U.S. EPA Washington Finance Center
Pesticide Registration Service Fee
C/O Mellon Client Service Center
500 Ross Street, Room 670
Box 360277
Pittsburgh, PA 15251-6277
Attn: EPA Module Supervisor
Telephone: (412) 236-2294

All payments must be in United States currency by check, bank draft, or money order drawn to the order of the Environmental Protection Agency. To ensure proper credit, please write the OPP DECISION NUMBER on your check, and enclose a copy of this letter with your payment.

Effective November 1, 2006, fees may be paid on-line via credit card or electronic fund transfer. To submit a payment on-line, visit www.pay.gov. From the pay.gov home page, select "search by form name." From the next page, select "P," then click on "Pesticide Registration Improvement Act. Fee Payment" and complete the form, making certain to use the decision number and registration number on the invoice you receive from the Pesticide Program in the space provided.

You may be eligible for a full or partial waiver of the registration service fee if, for example, you qualify as a small business or are applying for a minor use, or if your application is solely associated with an IR-4 tolerance petition. Please be advised that if you intend to request a waiver, you must do so in writing within 15 days of receipt of this invoice instead of remitting the amount indicated above. OPP will not consider waiver requests after the registration service fee has been paid. Information regarding eligibility and how to request and document a fee waiver is available on the OPP Fee for Service web site at www.epa.gov/pesticides/fees.

Please send Registration Service Fee Waiver requests to:

By USPS:

Document Processing Desk (WAIVER)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
1200 Pennsylvania Ave NW
Washington, DC 20460

By Courier:

Document Processing Desk (WAIVER)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900 Potomac Yard
2777 S. Crystal Dr.
Arlington, VA

A PRIA decision time review period will not start until a fee waiver is granted and/or the Agency receives certification that the outstanding fee has been paid. If the Agency does not receive certification of payment for this action or a fee waiver request within the next 45 days, the Agency will presume that you no longer want to pursue this action. The Agency will then initiate a process that may result in administrative withdrawal of this action.

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman,

at (703) 305-6249.

Sincerely,

Peresa Downs

Front End Processing Staff

Information Technology & Resources Management Division

MEMORANDUM

DATE: 7 / 12 / 07

TO: PM 25, Regulatory Manager

FROM: Information Services Branch, ITRMD

Your receipt of this data submission is not an indication that MRIDs for the enclosed studies have been posted in OPPIN.

We expect that it will be approximately 5 days from the above date before the study-level data is available in OPPIN.

If you have any questions about this process, please contact Teresa Downs (305-5363).

This is a: ☒ fully accepted submission
☐ partially accepted submission
☐ rejected submission



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

July 5, 2007

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

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If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman,

at (703) 305-6249.

Sincerely,

Teresa Downs

Front End Processing Staff

Information Technology & Resources Management Division

Fee for Service

{812735-~

This package includes the following

- ☐ New Registration
- ☒ Amendment

✓ Studies? ☐ Fee Waiver?
volpay % Reduction: ____

for Division

- ☐ AD
- ☐ BPPD
- ☒ RD

Risk Mgr. 25

Receipt No.

S- 812735

EPA File Symbol/Reg. No.

4787-26

Pin-Punch Date:

6/27/2007

☐ This item is NOT subject to FFS action.

Action Code:

Requested: R 34

Granted: R 34

Amount Due: \$ 3150.00

Parent/Child Decisions:

☐ Inert Cleared for Intended Use

☐ Uncleared Inert in Product

Reviewer: Venus Eagle

Date: 6/29/07

Remarks:



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

June 29, 2007

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

DIANE ALLEMANG
CHEMINOVA INC.
CHEMINOVA A/S
1600 WILSON BLVD., SUITE 700
ARLINGTON, VA 22209-2510

PRODUCT NAME: GLYPHOSPHATE TECHNICAL
COMPANY NAME: CHEMINOVA A/S
EPA FILE SYMBOL: 4787-26
EPA RECEIPT DATE: 06/27/07

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 25, at (703) 305-5697.

Sincerely, *A. White*
Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division

Receipt for Section 3					
S:	812735	Resubmission:	<input type="radio"/> Yes <input checked="" type="radio"/> No	<div>Print Letter</div> <div>Enter More Information</div> <div>Tracking</div>	
Regulatory Type:	Product Registration - Section 3	Fee For Service:	<input checked="" type="radio"/> Yes <input type="radio"/> No		
Application Type:	Amendment	Billable:	<input checked="" type="radio"/> Yes <input type="radio"/> No		
Company:	4787	CHEMINOVA A/S	V		
Risk Manager:	Registration Division, Risk Management Team 25				
Product #:	4787-26	Product Name:	GLYPHOSPHATE TECHNICAL		
Override#:					
Me Too Section3:		Me Too Product Name:			
Application Date:	27-Jun-2007	OPP Rec'd Date:	27-Jun-2007	<div>Receipt Content</div> <div>Study</div>	
Front End Date:	28-Jun-2007	Risk Manager Send Date:			
FFS Due Date:		Negotiated Due Date:			
OPP Target Date:					
Fast Track:	<input type="checkbox"/>	New Ingredient:	<input type="checkbox"/>		
Receipt Description:					
Amended CSF and label.		New Ingredient Request Date:			
		New Ingredient Received Date:			
Form A:	<input type="checkbox"/>	Signature Date:		Form B:	<input type="checkbox"/>
		Signature Date:			

EPA United States Environmental Protection Agency Washington, DC 20460		<input type="checkbox"/> Registration <input checked="" type="checkbox"/> Amendment <input type="checkbox"/> Other	OPP Identifier Number
Application for Pesticide - Section I			
1. Company/Product Number 4787-26		2. EPA Product Manager James Tompkins	
4. Company/Product (Name) Glyphosate Technical		3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted	
5. Name and Address of Applicant (Include ZIP Code) Cheminova A/S c/o Cheminova, Inc. 1600 Wilson Blvd., Suite 700 Arlington, VA 22209 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. Product Name	
Section - II			
<input checked="" type="checkbox"/> Amendment - Explain below. <input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application <input type="checkbox"/> Notification - Explain below. <input type="checkbox"/> Other - Explain below			
Explanation: Use additional page(s) if necessary. (For Section I and Section II.) *Application for amended CSF and label. *Category R34/89: \$3150 Non-fast-track. Source change to an unregistered source. *Contact: Diane Allemang: da.us@cheminova.com or fax: 703-373-8887			
Section - III			
1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No *Certification must be submitted	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Unit Packaging wgt. No. per container	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Package wgt. No. per container	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify)
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 5 lbs. - bulk	
		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Other _____ <input type="checkbox"/> Stenciled			
Section - IV			
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)			
Name Diane Allemang		Title Vice President Regulatory Affairs, Cheminova Inc.; EPA Agent for Cheminova A/S	
		Telephone No. (Include Area Code) 703-373-8883 x2	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature <i>Diane Allemang (tw)</i>		3. Title Vice President Regulatory Affairs, Cheminova Inc.; EPA Agent for Cheminova A/S	
4. Typed Name Diane Allemang		5. Date 6-27-2007	

Glyphosate Technical

For Manufacturing Use Only

ACTIVE INGREDIENT (dry basis):

Glyphosate, (Glycine, N-(phosphonomethyl)-),

OTHER INGREDIENTS (dry basis):

TOTAL:

98.0%

2.0%

100.0%

**KEEP OUT OF REACH CHILDREN
DANGER**

FIRST AID

IF SWALLOWED: -Call a poison control center or doctor immediately for treatment advice.
-Have person sip a glass of water if able to swallow.
-Do not induce vomiting unless told to by poison control center or doctor.
-Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING:

-Take off contaminated clothing.
-Rinse skin immediately with plenty of water for 15-20 minutes.
-Call a poison control center or doctor for treatment advice.

IF IN EYES:

-Hold eye open and rinse slowly and gently with water for 15-20 minutes.
-Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.
-Call a poison control center or doctor for treatment advice.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

IN CASE OF A MEDICAL EMERGENCY, CALL TOLL FREE DAY OR NIGHT, 1-866-303-6950

See side panel for additional precautionary statements.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

KEEP OUT OF REACH OF CHILDREN

DANGER

Corrosive. Causes irreversible eye damage. Harmful if absorbed through skin. Do not get in eyes or on clothing. Avoid contact with skin. Wear goggles or face shield. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

ENVIRONMENTAL HAZARDS

Do not contaminate water when cleaning equipment or disposing of wastes.

The active ingredient in this product is a non-selective broad spectrum herbicide. Do not handle or use in a manner that can result in accidental contact with desirable vegetation.

EPA Reg. No.: 4787-26

EPA Est. No.:

Manufactured for

CHEMINOVA A/S
P.O. Box 9
DK-7620 LEMVIG, DENMARK

Net Contents: ____ gallons (____ liters)

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

For use by commercial pesticide formulators.

For formulation into end-use herbicide products intended for the following uses:

(1) Fallow ground, pastures and sods, noncrop areas including: rights of way, industrial, recreational and public areas, forestry site preparation and release programs, site preparation or directed sprays to the floor of ornamental nurseries and Christmas tree farms, rights of way (ROW), Conservation Reserve Program (CRP), turfgrasses and grasses for seed production;

Residential sites:

Row Crops: corn, cotton, peanuts, sorghum, soybeans, sugarcane, barley, buckwheat, millet, oats, rice, rye, triticale, wheat, wild rice;

Citrus: Calamondin, chironja, citron, grapefruit, kumquat, lemon, lime, mandarin orange, orange, pummelo, tangelo, tangerine, tangors;

Tree Nuts: almond, beechnut, Brazil nut, butternut, cashew, chestnut, chinquapin, filbert (hazelnut), hickory nut, macadamia nut, pecan, pistachio, walnut;

Vine Crops: grapes and kiwi fruit;

Tree Fruits: apple, apricot, cherry, loquat, mayhaw, nectarine, olive, peach, pear, plum/prune, quince;

Vegetables: artichoke (Jerusalem), asparagus, beans, (all), beet greens, beets (red, sugar), broccoli (all), Brussels sprouts, cabbage (all), cabbage (Chinese), cantaloupe, carrot, cauliflower, casaba melon, celery, chard (Swiss), chicory, collards, crenshaw melon, cucumber, eggplant, endive, garlic, gourds, ground cherry, honeydew melon, honey ball melon, horseradish, kale, kohlrabi, leek, lentils, lettuce, mango melon, melons, muskmelon, mustard greens, okra, onion, rape greens, parsley, parsnips, peas (all), pepper (all), Persian melon, potato (Irish and sweet), pumpkin, radish, rhubarb, spinach, squash, tomatillo, tomato, turnip, watercress, watermelon, yams;

Small Fruits and Berries: blackberry, blueberry, boysenberry, cranberry, currant, dewberry, elderberry, gooseberry, huckleberry, loganberry, olallieberry, raspberry;

Forage Crops: alfalfa, forage grasses, forage legumes;

Tropical Crops: acerola, atemoya, avocado, banana (plantains), breadfruit, canistel, carambola, cherimoya, cocoa beans, coffee, dates, figs, genip, guava, jaboticaba, jackfruit, longan, lychee, mango, papaya, passion fruit, persimmons, pineapple, pomegranate, sapodilla, sapote (black, mamey, white) soursop, sugar apple, tamarind, tea;

(2) Uses for which the USEPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration; and

(3) Uses for experimental purposes that are in compliance with USEPA requirements.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage and disposal.

Pesticide Storage: Store in original container only. Do not store near heat or open flame. In case of spill or leak, sweep up and dispose of waste.

Pesticide Disposal: Open dumping is prohibited. Waste resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Disposal: Triple rinse (or equivalent). Then offer for recycling, or dispose of in a sanitary landfill or by other procedures approved by state and local authorities.

WARRANTY DISCLAIMER

Cheminova warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in strict accordance with the directions, subject to the inherent risks set forth below. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, CHEMINOVA MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR ANY OTHER EXPRESS OR IMPLIED WARRANTY.

INHERENT RISKS OF USE

It is impossible to eliminate all risks associated with use of this product. Unintended consequences may result because of factors such as use of the product contrary to label instructions, which are beyond the control of Cheminova or the Seller. Cheminova and the Seller shall not be responsible for any risks caused by the incorporation of this product into an end use product by the Buyer or User. Buyer is solely responsible for any risks created by the end use or uses to which Buyer or a User put this product. All of the foregoing risks shall be assumed by Buyer and User, and Buyer and User agree to hold Cheminova and Seller harmless for any claims related to such factors.

LIMITATION OF REMEDIES

To the extent consistent with applicable law, the exclusive remedy for losses or damages resulting from this product (including claims based on contract, negligence, strict liability, or other legal theories), shall be limited to one of the following, at Cheminova's election:

- (1) Refund of purchase price paid by buyer or user for product bought, or
- (2) Replacement of amount of product used.

In no case shall Cheminova be liable for consequential, incidental, or special damages or losses.

The terms of the Warranty Disclaimer above and this Limitation of Remedies cannot be varied by any written or verbal statements or agreements. No employee or sales agent of Cheminova or the Seller is authorized to vary or exceed the terms of the Warranty Disclaimer or this Limitation of Remedies in any manner.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, SW
Washington, DC 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460.

Do not send the completed form to this address.

Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address and Telephone Number Cheminova A/S, c/o Cheminova Inc. 1600 Wilson Blvd., Suite 700 Arlington, VA 22209	EPA Registration Number/File Symbol 4787-36
Active ingredient(s) and/or representative test compound(s) Glyphosate	Date
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Terrestrial food crop, greenhouse food crop, greenhouse non-food crop, aquatic food crop, terrestrial nonfood crop, aquatic non food use, forestry, domestic outdoor	Product Name Glyphosate Technical

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulators Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose)

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

☐ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

☒ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature <i>Diane Allemang</i>	Date <i>6-27-2007</i>	Typed or Printed Name and Title Diane Allemang, Vice President Regulatory Affairs, Cheminova Inc.; EPA Agent for Cheminova A/S
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date:	EPA Reg. No./File Symbol: 4787-26	Page 1 of 35
Applicant's/Registrant's Name & Address: Cheminova A/S, c/o Cheminova, Inc., 1600 Wilson Blvd., Suite 700 Arlington, VA 22209	Product Glyphosate Technical	
Ingredient: Glyphosate		
Guideline Ref. Number	Guideline Study Name	MRID Number
		Submitter
		Status

PRODUCT IDENTITY, COMPOSITION, AND ANALYSIS:

830.1550 / 61-1	Product Identity and Composition	Cheminova EPA Co. # 4787	OWN
830.1600 / 61-2A	Starting Materials & Manuf. Process	Cheminova EPA Co. # 4787	OWN
830.1670 / 61-2B	Formation of Impurities	Cheminova EPA Co. # 4787	OWN
830.1700 / 62-1	Preliminary Analysis	Cheminova EPA Co. # 4787	OWN
830.1750 / 62-2	Certification of Limits	Cheminova EPA Co. # 4787	OWN
830.1800 / 62-3	Analytical Method	Cheminova EPA Co. # 4787	OWN

PHYSICAL AND CHEMICAL CHARACTERISTICS:

63-2	Color (MP & TGA)	161333	6/30/1986	Monsanto	PER
63-3	Physical State (MP & TGA)	161333	6/30/1986	Monsanto	PER
63-4	Odor (MP & TGA)	161333	6/30/1986	Monsanto	PER
63-5	Melting Point (TGA)	51977	6/1/1976	Monsanto	PER
63-6	Boiling Point (TGA)	NR			
63-7	Density, Bulk Density or Specific Gravity (MP & TGA)	161333	6/30/1986	Monsanto	PER
63-8	Solubility (TGA or PA)	161333	6/30/1986	Monsanto	PER
63-9	Vapor Pressure (TGA or PA)	41096101	5/10/1989	Monsanto	PER
63-10	Dissociation Constant (TGA or PA)	161333	6/30/1986	Monsanto	PER
63-11	Octanol/Water Partition Coefficient (PA)	108192	6/5/1978	Monsanto	PER
63-12	pH (MP & TGA)	152385	7/30/1984	Monsanto	PER
63-13	Stability (TGA)	152385	7/30/1984	Monsanto	PER
63-14	Oxidizing or Reducing Action (MP)	161333	6/30/1986	Monsanto	PER
63-15	Flammability (MP)	161333	6/30/1986	Monsanto	PER
63-16	Explosibility (MP)	161333	6/30/1986	Monsanto	PER

Signature

Diane Allemang

Name and Title

**Diane Allemang, Vice President, Regulatory Affairs,
Cheminova, Inc.; EPA Agent for Cheminova A/S**

Date

6-27-2007



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Ingredient: Glyphosate				
Guideline Ref. Number	Guideline Study Name	MRID Number	Submitter	Status

63-17	Storage Stability (MP)	152385	7/30/1984	Monsanto	PER
63-18	Viscosity (MP)	NR			
63-19	Miscibility (MP)	NR			
63-20	Corrosion Characteristics (MP)	161333	6/30/1986	Monsanto	PER
63-21	Dielectric Breakdown Voltage	NR			

ACUTE TESTING:

81-1	Oral LD50 - Rat (MP & TGAI)	41400601	2/6/1990	Monsanto	PER
81-2	Dermal LD50 (MP & TGAI)	41400602	2/6/1990	Monsanto	PER
81-3	Inhalation LC50 - Rat (MP & TGAI)	NR			
81-4	Primary Eye Irritation - Rabbit (MP)	41400603	2/6/1990	Monsanto	PER
81-5	Primary Dermal Irritation (MP)	41400604	2/6/1990	Monsanto	PER
81-6	Dermal Sensitization (MP)	137138	12/20/1983	Monsanto	PER
81-7	Acute Delayed Neurotoxicity - Hen (TGAI)	NR			

SUBCHRONIC TESTING:

82-1	90-Day Feeding - Rodent (TGAI)	40559401	3/16/1988	Monsanto	PER
	90-Day Feeding - Nonrodent (TGAI)	40557	1/15/1973	Monsanto	PER
82-2	21-Day Dermal (TGAI)	98460	3/22/1982	Monsanto	PER
82-3	90-Day Dermal (TGAI)	NR			
82-4	90-Day Inhalation - Rat (TGAI)	NR			
82-5	90-Day Neurotoxicity - Hen (TGAI)	NR			
	90-Day Neurotoxicity - Mammal (TGAI)	NR			

CHRONIC TESTING:

Signature <i>Diane Allemang</i>	Name and Title Diane Allemang, Vice President, Regulatory Affairs, Cheminova, Inc.; EPA Agent for Cheminova A/S	Date 6-27-2007
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Ingredient: Glyphosate				
Guideline Ref. Number	Guideline Study Name	MRID Number	Submitter	Status

83-1	Chronic Feeding - Rodent (TGAI)	41643801	9/26/1990	Monsanto	PER
		41728701	12/17/1990	Monsanto	PER
	Chronic Feeding - Nonrodent (TGAI)	153374	10/17/1985	Monsanto	PER
		162912	8/11/1986	Monsanto	PER
83-2	Oncogenicity Study - Rat (TGAI)	41643801	9/26/1990	Monsanto	PER
		41728701	12/17/1990	Monsanto	PER
	Oncogenicity Study - Mouse (TGAI)	130406	7/29/1983	Monsanto	PER
		150564	10/7/1985	Monsanto	PER
153376		10/28/1985	Monsanto	PER	
83-3	Teratology - Rat (TGAI)	46362	5/13/1980	Monsanto	PER
	Teratology - Rabbit (TGAI)	46363	5/13/1980	Monsanto	PER
83-4	Reproduction, 2-Generation (TGAI)	41621501	8/30/1990	Monsanto	PER

MUTAGENICITY TESTING:

84-2	Gene Mutation (TGAI)	78619	4/20/1979	Monsanto	PER
		132681	11/4/1983	Monsanto	PER
		137640	2/9/1984	Monsanto	PER
		78620	4/20/1979	Monsanto	PER
	Chromosomal Aberration (TGAI)	46364	5/13/1980	Monsanto	PER
		132682	11/4/1983	Monsanto	PER
		132683	11/4/1983	Monsanto	PER
		132684	11/4/1983	Monsanto	PER
		132685	11/4/1983	Monsanto	PER

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Ingredient: Glyphosate				
Guideline Ref. Number	Guideline Study Name	MRID Number	Submitter	Status

84-4	Other Mechanisms of Mutagenicity (TGAI)	132686	11/4/1983	Monsanto	PER
		132680	11/4/1983	Monsanto	PER
		45726801	7/26/2002	Monsanto	PER
		45726802	7/26/2002	Monsanto	PER

SPECIAL TESTING:

85-1	General Metabolism (PAIRA)	40767101	8/11/1988	Monsanto	PER
		40767102	8/11/1988	Monsanto	PER
85-2	Dermal Penetration	137139	12/20/1983	Monsanto	PER
		137140	12/20/1983	Monsanto	PER
86-1	Domestic Animal Safety	NR			

AVIAN AND MAMMALIAN TESTING:

71-1	Avian Oral LD50 (TGAI)	108204	3/1/1978	Monsanto	PER
71-2	Avian Dietary LC50 (TGAI)	108107	7/12/1974	Monsanto	PER
	Avian Dietary LC50 (EP)	44465701	1/19/1998	Monsanto	PER
		44465702	1/19/1998	Monsanto	PER
		45777402	10/3/2002	Monsanto	PER
71-3	Wild Mammal Toxicity (TGAI)	NR			
71-4	Avian Reproduction (TGAI)	108207	11/13/1978	Monsanto	PER
		111953	11/13/1978	Monsanto	PER
71-5	Simulated / Actual Field Testing -	NR			

AQUATIC ORGANISM TESTING:

72-1	Freshwater Fish LC50 (TGAI)	108112	7/12/1974	Monsanto	PER
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Ingredient: Glyphosate				
Guideline Ref. Number	Guideline Study Name	MRID Number	Submitter	Status

		136339	11/28/1978	Monsanto	PER
	Freshwater Fish LC50 (MUP)	44715409	12/10/1998	Monsanto	PER
72-1	Freshwater Fish LC50 (TEP)	108112	7/12/1974	Monsanto	PER
		70894	3/30/1981	Monsanto	PER
		70895	3/30/1981	Monsanto	PER
		70896	3/30/1981	Monsanto	PER
		70897	3/30/1981	Monsanto	PER
		40579201	3/25/1988	Monsanto	PER
		40579202	3/25/1988	Monsanto	PER
		40579203	3/25/1988	Monsanto	PER
		45365002	3/20/2001	Monsanto	PER
		45365003	3/20/2001	Monsanto	PER
		45780201	10/10/2002	Monsanto	PER
		45767101	9/24/2002	Monsanto	PER
72-2	Acute LC50 Freshwater Invertebrates (TGA)	136338	11/28/1978	Monsanto	PER
72-2	Acute LC50 Freshwater Invertebrates (TEP)	108109	7/12/1974	Monsanto	PER
		70893	3/30/1981	Monsanto	PER
		44715410	12/10/1998	Monsanto	PER
		45365004	3/20/2001	Monsanto	PER
		45777401	10/3/2002	Monsanto	PER
72-3	Acute LC50 Estuarine and Marine Organisms (TGA)	108110	7/12/1974	Monsanto	PER
		108111	7/12/1974	Monsanto	PER

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Ingredient: Glyphosate				
Guideline Ref. Number	Guideline Study Name	MRID Number	Submitter	Status

73-4	Fish Early Life Stage and Aquatic Invertebrate Life-Cycle (TGAI)	136339	11/28/1978	Monsanto	PER
		124761	12/20/1982	Monsanto	PER
		124762	12/20/1982	Monsanto	PER
		124763	12/20/1982	Monsanto	PER
72-5	Fish - Life-Cycle (TGAI)	108172	12/22/1978	Monsanto	PER
72-6	Aquatic Organism Accumulation (TGAI)	111942	7/12/1974	Monsanto	PER
		94971	2/26/1982	Monsanto	PER
		108173	12/22/1978	Monsanto	PER
		41228301	9/5/1989	Monsanto	PER
		41228302	9/5/1989	Monsanto	PER
72-7	Simulated or Actual Field Testing (TEP)	NR			
	Earthworm	45767109	9/24/2002	Monsanto	PER
		45732903	7/25/2002	Monsanto	PER
	Soil Microbes	45780203	10/10/2002	Monsanto	PER
		45767103	9/24/2002	Monsanto	PER

TARGET AREA PHYTOTOXICITY

121-1 Target Area Phytotoxicity (TEP)

NONTARGET AREA PHYTOTOXICITY

TIER I:

122-1	Seed Germination/Seedling Emergence (TGAI)	40159301	4/10/1987	Monsanto	PER
122-1	Vegetative Vigor (TGAI) (1)				

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Ingredient: Glyphosate		
Guideline Ref. Number	Guideline Study Name	MRID Number
		Submitter
		Status

122-2 Aquatic Plant Growth (TGAI) (2)

TIER II:

123-1 Seed Germination/Seedling Emergence (TGAI)

NR

123-1 Vegetative Vigor (TGAI)

43088701

1/17/1994

Monsanto

PER

123-2 Aquatic Plant Growth (TGAI)

40236901

6/12/1987

Monsanto

PER

40236902

6/12/1987

Monsanto

PER

40236903

6/12/1987

Monsanto

PER

40236904

6/12/1987

Monsanto

PER

40236905

6/12/1987

Monsanto

PER

Aquatic Plant Growth (TEP)

45777403

10/3/2002

Monsanto

PER

45767101

9/24/2002

Monsanto

PER

45780201

10/10/2002

Monsanto

PER

TIER III:

124-1 Terrestrial Field (TEP)

NR

124-2 Aquatic Field (TEP)

NR

(1) Tier I Vegetative Vigor studies were combined with Tier II Vegetative Vigor studies.

(2) Tier I Aquatic Plant Growth studies were combined with Tier II Aquatic Plant Growth studies.

POLLINATORS:

141-1 Honeybee Acute Contact Toxicity (TGAI)

108108

7/12/1974

Monsanto

PER

Honeybee Acute Contact Toxicity (EP)

44465703

1/19/1998

Monsanto

PER

45370301

4/4/2001

Monsanto

PER

Signature

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Name and Title

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Ingredient: Glyphosate				
Guideline Ref. Number	Guideline Study Name	MRID Number	Submitter	Status

		45767104	9/24/2002	Monsanto	PER
		45780204	10/10/2002	Monsanto	PER
141-2	Honeybee - Toxicity of Residues on Foliage (TEP)	NR			
		45370302	4/4/2001	Monsanto	PER
141-4	Honeybee Subacute Feeding Study (TEP) (1)				
141-5	Field Testing for Pollinators (TEP)	NR			

AQUATIC INSECTS:

142-1	Acute Toxicity to Aquatic Insects(2)
142-2	Aquatic Insect Life-Cycle Study(2)
142-3	Simulated or Actual Field Testing(2) for Aquatic Insects

PREDATORS AND PARASITES:

143-1 thru 143-3(2)					
	Lacewing	45767110	9/24/2002	Monsanto	PER
		45780205	10/10/2002	Monsanto	PER
	Predatory Mite	45767105	9/24/2002	Monsanto	PER
		45767106	9/24/2002	Monsanto	PER
		45780206	10/10/2002	Monsanto	PER
		45732901	7/25/2002	Monsanto	PER
	Parasitoid	45767107	9/24/2002	Monsanto	PER
		45767108	9/24/2002	Monsanto	PER
		45732902	7/25/2002	Monsanto	PER

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Ingredient: Glyphosate				
Guideline Ref. Number	Guideline Study Name	MRID Number	Submitter	Status

45732904 7/25/2002 Monsanto PER

- (1) Reserved pending development of test methodology.
(2) Reserved pending further evaluation to determine what and when data should be required, and to develop appropriate test methods.

132-1	Foliar Dissipation (TEP)	NR			
132-1	Soil Dissipation (TEP)	NR			
133-3	Dermal Exposure (TEP)	41554901	6/29/1990	Monsanto	PER
		41554902	6/29/1990	Monsanto	PER
133-4	Inhalation Exposure (TEP)	NR			

DEGRADATION STUDIES - LAB:

161-1	Hydrolysis (TGAI or PAIRA)	108192	6/5/1978	Monsanto	PER
	Hydrolysis (MUP)	44715408	12/10/1998	Monsanto	PER

PHOTODEGRADATION:

161-2	In Water (TGAI or PAIRA)	41689101	11/1/1990	Monsanto	PER
161-3	On Soil (TGAI or PAIRA)	41355101	12/18/1989	Monsanto	PER
161-4	In Air (TGAI or PAIRA)	NR			

METABOLISM STUDIES - LAB:

162-1	Aerobic Soil (TGAI or PAIRA)	41742901	1/3/1991	Monsanto	PER
		43272501	6/24/1992	Monsanto	PER
162-2	Anaerobic Soil (TGAI or PAIRA)	NR			
162-3	Anaerobic Aquatic (TGAI or PAIRA)	41723701	12/7/1990	Monsanto	PER

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Ingredient: Glyphosate				
Guideline Ref. Number	Guideline Study Name	MRID Number	Submitter	Status

162-4	Aerobic Aquatic (TGAI or PAIRA)	42372502	6/24/1992	Monsanto	PER
		41723601	12/7/1990	Monsanto	PER
		42372503	6/24/1992	Monsanto	PER

MOBILITY STUDIES:

163-1	Leaching and Adsorption/Desorption (TGAI or PAIRA)	39938	7/12/1974	Monsanto	PER
		108192	6/5/1978	Monsanto	PER
		64703	12/16/1980	Monsanto	PER
163-2	Volatility - Lab (TEP)	NR			
163-3	Volatility - Field (TEP)	NR			

DISSIPATION STUDIES - FIELD:

164-1	Soil (TEP)	39939	7/12/1974	Monsanto	PER
		39940	7/12/1974	Monsanto	PER
		162910	8/6/1986	Monsanto	PER
		162922	8/7/1986	Monsanto	PER
		41096103	5/10/1989	Monsanto	PER
		42765001	5/3/1993	Monsanto	PER
		42765002	5/3/1993	Monsanto	PER
164-2	Aquatic Sediment (TEP)	39942	7/12/1974	Monsanto	PER
		40881601	11/9/1988	Monsanto	PER
		42383201	6/29/1992	Monsanto	PER
164-3	Forestry (TEP)	84657	9/29/1981	Monsanto	PER
		93922	2/1/1982	Monsanto	PER

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Ingredient: Glyphosate				
Guideline Ref. Number	Guideline Study Name	MRID Number	Submitter	Status

		162923	6/17/1983	Monsanto	PER
		134008	11/18/1983	Monsanto	PER
		162923	8/7/1986	Monsanto	PER
		41552801	6/2/1990	Monsanto	PER
164-4	Combination and Tank Mixes	NR			
164-5	Soil, Long-Term (TEP)	NR			

ACCUMULATION STUDIES:

165-1	Rotational Crops - Confined (PAIRA)	41543201	6/29/1990	Monsanto	PER
		41543202	6/29/1990	Monsanto	PER
		42372504	6/24/1992	Monsanto	PER
165-2	Rotational Crops - Field (TEP)	108159	10/14/1977	Monsanto	PER
165-3	Irrigated Crops (TEP)	40541305	2/23/1988	Monsanto	PER
165-4	In Fish (TGAI or PAIRA)	108173	12/22/1978	Monsanto	PER

RESIDUE CHEMISTRY 40 CFR 158.240 (860 Series)

171-2	Chemical Identity (TGAI)	41228201	8/30/1989	Monsanto	PER
171-3	Directions for Use (1)				

NATURE OF THE RESIDUE:

171-4(a)	Plants (PAIRA)	Appendix A			
171-4(b)	Livestock (PAIRA and Plant Metabolites)	40541301	2/23/1988	Monsanto	PER
		40541302	2/23/1988	Monsanto	PER

RESIDUE METHODOLOGY:

Signature <i>Diane Allemang</i>	Name and Title Diane Allemang, Vice President, Regulatory Affairs, Cheminova, Inc.; EPA Agent for Cheminova A/S	Date 6-27-2007 59
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Ingredient: Glyphosate				
Guideline Ref. Number	Guideline Study Name	MRID Number	Submitter	Status

171-4(c)	Residue Analytical Method - Plants (TGAi and Metabolites)	108231	7/24/1979	Monsanto	PER
		164729	10/20/1986	Monsanto	PER
		40502601	1/29/1988	Monsanto	PER
					PER
171-4(d)	Residue Analytical Method - Animals (TGAi and Metabolites)	40541303	2/23/1988	Monsanto	
171-4	Residue Analytical Method - Water (TGAi and Metabolites)	159419	5/19/1986	Monsanto	PER
		40502605	1/29/1988	Monsanto	PER
171-4(e)	Storage Stability (PAI)(In Plants, Animal Products, and Water)	40502605	1/29/1988	Monsanto	PER
		40532004	2/23/1988	Monsanto	PER
		41472002	4/2/1990	Monsanto	PER
		41573501	7/25/1990	Monsanto	PER
		41940701	7/12/1991	Monsanto	PER

MAGNITUDE OF THE RESIDUE:

171-4(k)	Crop Field Trials (TEP)	Appendix B			
171-4(l)	Processed Food/Feed (EP)	Appendix B			
171-4(j)	Meat/Milk/Poultry/Eggs (TGAi or Plant Metabolites)	108115	7/12/1974	Monsanto	PER
		40532001	2/23/1988	Monsanto	PER
		40532002	2/23/1988	Monsanto	PER

Signature <i>Diane Allemang</i>	Name and Title Diane Allemang, Vice President, Regulatory Affairs, Cheminova, Inc.; EPA Agent for Cheminova A/S	Date 6-27-2007
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Ingredient: Glyphosate				
Guideline Ref. Number	Guideline Study Name	MRID Number	Submitter	Status

		40532003	2/23/1988	Monsanto	PER
		40532004	2/23/1988	Monsanto	PER
171-4(f)	Potable Water (EP)	Appendix C			
171-4(g)	Fish (EP)	Appendix D			
171-4(h)	Irrigated Crops (EP)	Appendix B			
171-4(i)	Food Handling (EP)	NR			
171-5	Reduction of Residue	NR			
171-6	Proposed Tolerances(2)				
171-7	Reasonable Grounds in Support of the Petition(3)				
(1)	Directions for Use are contained in Product Labels or Section B of Petitions				
(2)	Proposed Tolerances are contained in Section F of Petitions				
(3)	Reasonable Grounds in Support of the Petition are contained in Section G of Petitions				

RESIDUE CHEMISTRY APPENDIX A
NATURE OF THE RESIDUE: PLANTS

171-4(a)					
	Corn	137903	7/12/1974	Monsanto	PER
		47778	7/12/1974	Monsanto	PER
	Roundup Ready® Corn	43712701	6/29/1995	Monsanto	PER
	Wheat	137903	7/12/1974	Monsanto	PER
		47778	7/12/1974	Monsanto	PER

Signature <i>Diane Allemang</i>	Name and Title Diane Allemang, Vice President, Regulatory Affairs, Cheminova, Inc.; EPA Agent for Cheminova A/S	Date <i>6-27-2007</i>
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Ingredient: Glyphosate		
Guideline Ref. Number	Guideline Study Name	MRID Number

Soybeans	137903	7/12/1974	Monsanto	PER
	47778	7/12/1974	Monsanto	PER
Roundup Ready® Soybeans	43330601	7/22/1994	Monsanto	PER
Cotton	137903	7/12/1974	Monsanto	PER
	47778	7/12/1974	Monsanto	PER
Roundup Ready® Cotton	44279301	5/19/1997	Monsanto	PER
Grapes	38981	10/4/1974	Monsanto	PER
Citrus	41165	1/19/1976	Monsanto	PER
Coffee	51983	6/1/1976	Monsanto	PER
Sugarcane	61558	3/1/1976	Monsanto	PER
Pome Fruit	108129	9/1/1976	Monsanto	PER
Forage Grass and Legumes	108147	4/28/1978	Monsanto	PER
Sugar Beets	108152	12/9/1977	Monsanto	PER

Signature

Diane Allemang

Name and Title

**Diane Allemang, Vice President, Regulatory Affairs,
Cheminova, Inc.; EPA Agent for Cheminova A/S**

Date

6-27-2007



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Ingredient: Glyphosate				
Guideline Ref. Number	Guideline Study Name	MRID Number	Submitter	Status

Grapes	38771	10/4/1974	Monsanto	PER
Nut Crops	111945	11/30/1976	Monsanto	PER
Alfalfa	108133	12/31/1976	Monsanto	PER
Vegetables	108159	10/15/1977	Monsanto	PER
Roundup Ready® Canola	44541201	4/3/1998	Monsanto	PER

RESIDUE CHEMISTRY APPENDIX B
MAGNITUDE OF THE RESIDUE: CROPS, IRRIGATED CROPS, AND PROCESSED COMMODITIES

171-

4(k,l)

ROOT AND TUBER VEGETABLES GROUP:

Beets, garden

Carrots

Radishes

Potatoes

108159	10/14/1977	Monsanto	PER
39381	9/25/1975	Monsanto	PER
108159	10/14/1977	Monsanto	PER
108151	12/9/1977	Monsanto	PER
40785302	7/29/1988	Monsanto	PER
41947001	7/15/1991	Monsanto	PER
41947002	7/15/1991	Monsanto	PER

Signature <i>Diane Allemang</i>	Name and Title Diane Allemang, Vice President, Regulatory Affairs, Cheminova, Inc.; EPA Agent for Cheminova A/S	Date 6-27-2007
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Ingredient: Glyphosate		
Guideline Ref. Number	Guideline Study Name	MRID Number

Submitter	Status
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	43906101	1/22/1996	Monsanto	PER
Processed Potato Commodities	40785302	7/29/1988	Monsanto	PER
	43906101	1/22/1996	Monsanto	PER
Sugar Beets	108159	10/14/1977	Monsanto	PER
	108151	12/9/1977	Monsanto	PER
	39381	9/25/1975	Monsanto	PER
	40785304	7/29/1988	Monsanto	PER
	43315703	7/19/1994	Monsanto	PER
Roundup Ready® Sugar Beets	44331601	7/11/1997	Monsanto	PER
	44331602	7/11/1997	Monsanto	PER
	44331603	7/11/1997	Monsanto	PER
Sweet Potatoes				
Turnip	40835201	10/3/1988	IR-4	PER

171-
4(k,l)

LEAVES OF ROOT AND TUBER VEGETABLES GROUP:

Sugar Beet Tops	39381	9/25/1975	Monsanto	PER
	108159	10/14/1977	Monsanto	PER

Signature

Diane Allemang

Name and Title

**Diane Allemang, Vice President, Regulatory Affairs,
Cheminova, Inc.; EPA Agent for Cheminova A/S**

Date

6-27-2007



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Ingredient: Glyphosate		
Guideline Ref. Number	Guideline Study Name	MRID Number

Roundup Ready® Sugar Beets
Carrot Tops

44331601

7/11/1997

Monsanto

PER

108159

10/14/1977

Monsanto

PER

171-
4(k,l)

BULB VEGETABLE GROUP:

Onions, Leeks, Garlic

40783101

8/8/1988

IR-4

PER

171-
4(k,l)

LEAFY VEGETABLES (EXCEPT BRASSICA VEGETABLES) GROUP:

Celery

40578001

IR-4

PER

Spinach

40578002

IR-4

PER

Lettuce

108159

10/14/1977

Monsanto

PER

171-
4(k,l)

BRASSICA LEAFY VEGETABLES GROUP:

Cabbage

108159

10/14/1977

Monsanto

PER

Broccoli

40802801

8/18/1988

IR-4

PER

Mustard Greens

40802802

8/18/1988

IR-4

PER

Signature

Diane Allemang

Name and Title

**Diane Allemang, Vice President, Regulatory Affairs,
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Date

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Ingredient: Glyphosate		
Guideline Ref. Number	Guideline Study Name	MRID Number
		Submitter
		Status

171-

4(k,l)

LEGUME VEGETABLES GROUP:

Dried Beans

108159	10/14/1977	Monsanto
44837501	5/21/1999	Monsanto
44837502	5/21/1999	Monsanto
45647501	3/28/2002	Monsanto

PER

PER

PER

PER

Lentils

Peas

108159	10/14/1977	Monsanto
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PER

Peas (dry)

44407501		IR-4
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PER

Peas (import)

43807201	9/27/1995	Monsanto
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PER

42312804	5/1/1992	Monsanto
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PER

Dry Beans - Canada

44837501	5/20/1999	Monsanto
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PER

44837502	5/20/1999	Monsanto
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PER

Snap Beans

108159	10/14/1977	Monsanto
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PER

Soybeans/Soybean Processing Commodities

123953	11/12/1973	Monsanto
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PER

38908	7/12/1974	Monsanto
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PER

33954	12/19/1975	Monsanto
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PER

61555	3/1/1976	Monsanto
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PER

108153	6/17/1977	Monsanto
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PER

24503	12/12/1977	Monsanto
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PER

Signature

Diane Allemang

Name and Title

Diane Allemang, Vice President, Regulatory Affairs,
Cheminova, Inc.; EPA Agent for Cheminova A/S

Date

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Ingredient: Glyphosate				
Guideline Ref. Number	Guideline Study Name	MRID Number	Submitter	Status

108203	7/6/1978	Monsanto	PER
84936	10/21/1981	Monsanto	PER
156793	2/21/1986	Monsanto	PER
43260401	5/27/1994	Monsanto	PER
43260402	5/27/1994	Monsanto	PER
43260403	5/27/1994	Monsanto	PER

171-
4(k,l)

FOLIAGE OF LEGUME VEGETABLES GROUP:

Bean Vines and Hay
Lentil Forage and Hay
Soybean Forage and Hay

123953	11/12/1973	Monsanto	PER
38908	7/12/1974	Monsanto	PER
33954	12/19/1975	Monsanto	PER
61555	3/1/1976	Monsanto	PER
108153	6/17/1977	Monsanto	PER
108203	7/6/1978	Monsanto	PER
84936	10/21/1981	Monsanto	PER
156793	2/21/1986	Monsanto	PER

171-
4(k,l)

FRUITING VEGETABLES (EXCEPT CURCUBITS) GROUP:

Signature <i>Diane Allemang</i>	Name and Title Diane Allemang, Vice President, Regulatory Affairs, Cheminova, Inc.; EPA Agent for Cheminova A/S	Date 6-27-2007
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Ingredient: Glyphosate		
Guideline Ref. Number	Guideline Study Name	MRID Number
		Submitter
		Status

171-
4(k,l) CURCUBITS VEGETABLES GROUP

171-
4(k,l) CITRUS FRUITS GROUP:

Citrus/Citrus Processed Commodities

44496	1/19/1976	Monsanto
39142	1/19/1976	Monsanto
40159401	4/10/1987	Monsanto

PER
PER
PER

171-
4(k,l) POME FRUITS GROUP:

108129	9/1/1976	Monsanto
108186	9/1/1976	Monsanto

PER
PER

171-
4(k,l) STONE FRUITS GROUP:

Plums

40785301	7/29/1988	Monsanto
43315701	7/19/1994	Monsanto

PER
PER

171-
4(k,l) SMALL FRUITS AND BERRIES GROUP:

Signature <i>Diane Allemang</i>	Name and Title Diane Allemang, Vice President, Regulatory Affairs, Cheminova, Inc.; EPA Agent for Cheminova A/S	Date 6-27-2007
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Ingredient: Glyphosate				
Guideline Ref. Number	Guideline Study Name	MRID Number	Submitter	Status

Blackberries

Blueberries

Cranberries

53002 9/10/1980
40779101 8/2/1988

IR-4

PER

IR-4

PER

Grapes/Raisins

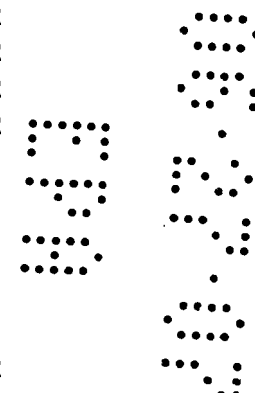
38770 10/4/1974
108132 12/31/1976
40785303 7/29/1988
43315702 7/19/1994

Monsanto
Monsanto
Monsanto
Monsanto

PER
PER
PER
PER

Raspberries

Strawberries



171-
4(k,l)

TREE NUTS:

Almond, Almond Hulls, Macadamia, Pecan, Walnut

111945 11/30/1976
42155301 1/3/1992
42155302 1/3/1992

Monsanto
Monsanto
Monsanto

PER
PER
PER

171-
4(k,l)

CEREAL GRAINS GROUP:

Barley

38908 7/12/1974
108203 7/6/1978

Monsanto
Monsanto

PER
PER

Signature

Diane Allemang

Name and Title

**Diane Allemang, Vice President, Regulatory Affairs,
Cheminova, Inc.; EPA Agent for Cheminova A/S**

Date

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Ingredient: Glyphosate				
Guideline Ref. Number	Guideline Study Name	MRID Number	Submitter	Status

Barley (import)	42312801	5/1/1992	Monsanto	PER
	42312802	5/1/1992	Monsanto	PER
	43807202	9/27/1995	Monsanto	PER
	43827802	9/27/1995	Monsanto	PER
	43845401	9/27/1995	Monsanto	PER
Corn Grain	123953	11/12/1973	Monsanto	PER
	38908	7/12/1974	Monsanto	PER
	48284	5/15/1975	Monsanto	PER
	49054	12/19/1975	Monsanto	PER
	23336	12/12/1977	Monsanto	PER
	23268	12/12/1977	Monsanto	PER
	108203	7/6/1978	Monsanto	PER
	37687	3/30/1979	Monsanto	PER
	130807	10/12/1983	Monsanto	PER
	40502602	1/29/1988	Monsanto	PER
	43655701	5/19/1995	Monsanto	PER
	45066901	3/16/2000	Monsanto	PER
Roundup Ready® Corn	43712702	6/29/1995	Monsanto	PER
	44531301	4/2/1998	Monsanto	PER
	45077401	3/23/2000	Monsanto	PER
Corn Oil/Corn Milled Products	40502604	1/29/1988	Monsanto	PER
	41478101	4/2/1990	Monsanto	PER

Signature

Diane Allemang

Name and Title

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DATA MATRIX

Date:	EPA Reg. No./File Symbol: 4787-26	Page 23 of 35
Applicant's/Registrant's Name & Address: Cheminova A/S, c/o Cheminova, Inc., 1600 Wilson Blvd., Suite 700 Arlington, VA 22209	Product Glyphosate Technical	
Ingredient: Glyphosate		
Guideline Ref. Number	Guideline Study Name	MRID Number

	43655702	5/19/1995	Monsanto	PER
Oat Grain	38908	7/12/1974	Monsanto	PER
	108203	7/6/1978	Monsanto	PER
Oats / Processed Oats (Preharvest Import Tolerance)	43870201	11/16/1995	Monsanto	PER
	43870202	11/16/1995	Monsanto	PER
	43870203	11/16/1995	Monsanto	PER
	43870204	11/16/1995	Monsanto	PER
	43927401	11/16/1995	Monsanto	PER
	43927402	11/16/1995	Monsanto	PER
Rice Grain	38908	7/12/1974	Monsanto	PER
Roundup Ready® Rice	45365001	3/20/2001	Monsanto	PER
Rice Processed Commodities	45365001	3/20/2001	Monsanto	PER
Sorghum Grain	38908	7/12/1974	Monsanto	PER
	108203	7/6/1978	Monsanto	PER
	109271	4/9/1982	Monsanto	PER
	103375	6/4/1982	Monsanto	PER
	130807	10/12/1983	Monsanto	PER
	144722	10/10/1984	Monsanto	PER
	40502601	1/29/1988	Monsanto	PER
	43342001	8/15/1994	Monsanto	PER
	44646601	9/1/1998	Monsanto	PER
Grain Sorghum Processed Products	40502603	1/29/1988	Monsanto	PER

Signature <i>Diane Allemang</i>	Name and Title Diane Allemang, Vice President, Regulatory Affairs, Cheminova, Inc.; EPA Agent for Cheminova A/S	Date 6-27-2007 71
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Ingredient: Glyphosate		
Guideline Ref. Number	Guideline Study Name	MRID Number

Submitter	Status
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Wheat Grain	41472001	4/2/1990	Monsanto	PER
	43342002	8/15/1994	Monsanto	PER
	123953	11/12/1973	Monsanto	PER
	38908	7/12/1974	Monsanto	PER
	108203	7/6/1978	Monsanto	PER
	122715	12/2/1982	Monsanto	PER
Roundup Ready® Wheat	150835	11/13/1984	Monsanto	PER
	41484301	4/16/1990	Monsanto	PER
	45174701	7/19/2000	Monsanto	PER
	45290401	12/28/2000	Monsanto	PER
Roundup Ready® Wheat Reduced Risk				
Wheat Milled Products	150835	11/13/1984	Monsanto	PER

171-
4(k,l)

FORAGE, FODDER, AND STRAW OF CEREAL GRAINS GROUP:

Barley Forage, Hay, and Straw	38908	7/12/1974	Monsanto	PER
	108203	7/6/1978	Monsanto	PER
Corn Forage, Silage, and Fodder	123953	11/12/1973	Monsanto	PER
	38908	7/12/1974	Monsanto	PER
	49054	12/19/1975	Monsanto	PER
	48284	5/15/1975	Monsanto	PER

Signature

Name and Title

Date

**Diane Allemang, Vice President, Regulatory Affairs,
Cheminova, Inc.; EPA Agent for Cheminova A/S**

6-27-2007



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Ingredient: Glyphosate				
Guideline Ref. Number	Guideline Study Name	MRID Number	Submitter	Status

	23336	12/12/1977	Monsanto	PER
	23268	12/12/1977	Monsanto	PER
	108203	7/6/1978	Monsanto	PER
	37687	3/30/1979	Monsanto	PER
	130807	10/12/1983	Monsanto	PER
	40502602	1/29/1988	Monsanto	PER
	43655701	5/19/1995	Monsanto	PER
	43712702	6/29/1995	Monsanto	PER
	45066901	3/16/2000	Monsanto	PER
	45077401	3/23/2000	Monsanto	PER
Oat Forage, Hay, and Straw	38908	7/12/1974	Monsanto	PER
	108203	7/6/1978	Monsanto	PER
Rice Straw,	38908	7/12/1974	Monsanto	PER
	45365001	3/20/2001	Monsanto	PER
Sorghum Forage, Fodder, Silage, and Hay	38908	7/12/1974	Monsanto	PER
	108203	7/6/1978	Monsanto	PER
	109271	4/9/1982	Monsanto	PER
	103375	6/4/1982	Monsanto	PER
	130807	10/12/1983	Monsanto	PER
	144722	10/10/1984	Monsanto	PER
	40502601	1/29/1988	Monsanto	PER
Wheat Forage, Hay, and Straw	123953	11/12/1973	Monsanto	PER

Signature <i>Diane Allemang</i>	Name and Title Diane Allemang, Vice President, Regulatory Affairs, Cheminova, Inc.; EPA Agent for Cheminova A/S	Date 6-27-2007
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Ingredient: Glyphosate				
Guideline Ref. Number	Guideline Study Name	MRID Number	Submitter	Status

		38908	7/12/1974	Monsanto	PER
		108203	7/6/1978	Monsanto	PER
		122715	12/2/1982	Monsanto	PER
		150835	11/13/1984	Monsanto	PER
		41484301	4/16/1990	Monsanto	PER
		45174701	7/19/2000	Monsanto	PER

171-4(k,l)	GRASS FORAGE, FODDER, AND HAY GROUP:	108147	4/28/1978	Monsanto	PER
		53004	9/12/1980	Monsanto	PER
		76805	5/8/1981	Monsanto	PER
		45089401	3/27/2000	Monsanto	PER

171-4(k,l)	NONGRASS ANIMAL FEEDS GROUP:				
	Alfalfa Seed and Hay	108133	12/31/1976	Monsanto	PER
	Clover, trefoil, lespedeza	108147	4/28/1978	Monsanto	PER
		53004	9/12/1980	Monsanto	PER
		76805	5/8/1981	Monsanto	PER
		40541304	2/23/1988	Monsanto	PER
		43077001	12/16/1993	Monsanto	PER
		45365401	3/21/2001	Monsanto	PER
	Roundup Ready Alfalfa Forage, Hay and Seed	45646001	3/28/2002	Monsanto	PER

Signature <i>Diane Allemang</i>	Name and Title Diane Allemang, Vice President, Regulatory Affairs, Cheminova, Inc.; EPA Agent for Cheminova A/S	Date 6-27-2007
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Ingredient: Glyphosate		
Guideline Ref. Number	Guideline Study Name	MRID Number

Guideline Ref. Number	Guideline Study Name	MRID Number	Submitter	Status	
171-4(k,l)	Roundup Ready Alfalfa Reduced Risk Petition	Submitted	6/27/2002	Monsanto	PER
	MISCELLANEOUS COMMODITIES				
	Acerola				
	Asparagus	108144	2/17/1978	Monsanto	PER
		40642401	4/4/1988	IR-4	PER
	Avocados	108149	11/15/1977	Monsanto	PER
		108164	7/7/1978	Monsanto	PER
	Bananas (including Plantains)	108175	6/14/1979	Monsanto	PER
	Breadfruit	41049401	1989	IR-4	PER
	Canistel	41049401	1989	IR-4	PER
	Canola /Oilseed Rape / Processing	42312803	5/1/1992	Monsanto	PER
		43807203	9/27/1995	Monsanto	PER
	Roundup Ready® Canola	44528801	4/3/1998	Monsanto	PER
		44528802	4/3/1998	Monsanto	PER
		44528803	4/3/1998	Monsanto	PER
		44528804	4/3/1998	Monsanto	PER
	Coconut, Coconut Oil		3/9/1982	Monsanto	PER
	Coffee	51981	6/1/1976	Monsanto	PER
	Cottonseed	123953	11/12/1973	Monsanto	PER
		61553	3/1/1976	Monsanto	PER

Signature

Diane Allemang

Name and Title

**Diane Allemang, Vice President, Regulatory Affairs,
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Date

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Ingredient: Glyphosate		
Guideline Ref. Number	Guideline Study Name	MRID Number

Submitter	Status
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	108176	5/17/1976	Monsanto	PER
	108153	6/17/1977	Monsanto	PER
	108203	7/6/1978	Monsanto	PER
	60103	11/3/1980	Monsanto	PER
Cotton Forage and Hay	123953	11/12/1973	Monsanto	PER
	61553	3/1/1976	Monsanto	PER
	108163	5/17/1976	Monsanto	PER
	60103	11/3/1980	Monsanto	PER
Cotton Processing Fractions	61555	3/1/1976	Monsanto	PER
Roundup Ready® Cotton	43571801	3/6/1995	Monsanto	PER
	unknown	3/27/2003	Monsanto	PER
Dates	41049401	1989	IR-4	PER
Guava	59050	11/19/1980	IR-4	PER
Jackfruit	41049401	1989	IR-4	PER
Jabotica	41049401	1989	IR-4	PER
Kiwi Fruit				
Mangos	40580401	4/4/1988	IR-4	PER
Oil Seeds (Flax, Mustard, Rape, Sunflower)		11/26/1979	Monsanto	PER
Oil Seed Rape / Canola (Import)	43827801	9/27/1995	Monsanto	PER
	43807203	9/27/1995	Monsanto	PER
Olives, Processed	108175	6/14/1979	Monsanto	PER
	42398401	7/8/1992	Monsanto	PER

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Guideline Ref. Number	Guideline Study Name	MRID Number

Olive Oil	108175	6/14/1979	Monsanto	PER
	42398401	7/8/1992	Monsanto	PER
Palm Oils		8/2/1976	Monsanto	PER
Papayas	63713	11/20/1980	Monsanto	PER
Peanuts/Peanut Forage and Hay	28856	2/18/1980	Monsanto	PER
	144341	9/12/1984	Monsanto	PER
	40750702	6/20/1988	Monsanto	PER
Peanut Processed Commodities	144341	9/12/1984	Monsanto	PER
	40750702	6/20/1988	Monsanto	PER
Pineapple	43824301	10/18/1995	IR-4	PER
	43824302	10/18/1995	IR-4	PER
Pistachio Nuts	111945	11/30/1976	Monsanto	PER
Sapote	41049401	1989	IR-4	PER
Soursop	41049401	1989	IR-4	PER
Sugarcane	61558	3/1/1976	Monsanto	PER
	108140	6/21/1976	Monsanto	PER
	136876	3/1/1978	Monsanto	PER
	108168	8/25/1978	Monsanto	PER
Sugarcane Processed Commodities	108140	6/21/1976	Monsanto	PER
Tea, Instant Tea	78823	6/30/1981	Monsanto	PER

Signature

Diane Allemang

Name and Title

Diane Allemang, Vice President, Regulatory Affairs,
Cheminova, Inc.; EPA Agent for Cheminova A/S

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Ingredient: Glyphosate		
Guideline Ref. Number	Guideline Study Name	MRID Number
		Submitter
		Status

RESIDUE CHEMISTRY APPENDIX C
MAGNITUDE OF THE RESIDUE: POTABLE WATER

171-4(f) Canals	39381	9/25/1975	Public Doc. 1	PL
	36224	9/25/1975	Monsanto	PER
Flooded Levees	39381	9/25/1975	Monsanto	PER
	36224	9/25/1975	Monsanto	PER
Ponds	39381	9/25/1975	Public Doc.2	PL
	36224	9/25/1975	Monsanto	PER
Potable Water Treatment	36224	9/25/1975	Monsanto	PER
Ditchbank / Flowing Water	108173	12/22/1978	Monsanto	PER
Shoreline / Impounded Water	108173	12/22/1978	Monsanto	PER
Total Area / Impounded Water	108173	12/22/1978	Monsanto	PER
Whole Cross-Section / Flowing Water	77238	6/29/1981	Monsanto	PER

Signature <i>Diane Allemang</i>	Name and Title Diane Allemang, Vice President, Regulatory Affairs, Cheminova, Inc.; EPA Agent for Cheminova A/S	Date 6-27-2007
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Ingredient: Glyphosate				
Guideline Ref. Number	Guideline Study Name	MRID Number	Submitter	Status

1 R.D. Comes. USDA/ARS. Prosser, Washington.

2 R.D. Blackburn. WSDA/ARS. Fort Lauderdale, Florida.

RESIDUE CHEMISTRY APPENDIX D
MAGNITUDE OF THE RESIDUE: FISH

171-4(g) ACCUMULATION STUDIES

Rainbow Trout	108173	12/22/1978	Monsanto	PER
	36229	9/25/1975	Monsanto	PER
Largemouth Bass	108173	12/22/1978	Monsanto	PER
	36229	9/25/1975	Monsanto	PER
Channel Catfish	108173	12/22/1978	Monsanto	PER
	94971	2/26/1982	Monsanto	PER
	36229	9/25/1975	Monsanto	PER
Bluegill Sunfish	36229	9/25/1975	Monsanto	PER
	76491	11/12/1973	Monsanto	PER
	41228301	9/5/1989	Monsanto	PER
	41228302	9/5/1989	Monsanto	PER
Crayfish	108173	12/22/1978	Monsanto	PER

Signature

Diane Allemang

Name and Title

**Diane Allemang, Vice President, Regulatory Affairs,
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Ingredient: Glyphosate				
Guideline Ref. Number	Guideline Study Name	MRID Number	Submitter	Status

		132170	6/15/1983	Monsanto	PER
		155120	11/22/1985	Monsanto	PER
Mollusks		108173	12/22/1987	Monsanto	PER
		128690	6/15/1983	Monsanto	PER
		154311	11/22/1985	Monsanto	PER
Oysters and Clams		45779601	10/14/2002	Monsanto	PER

APPENDIX E
EXPLANATION OF DATA NOT REQUIRED TO SUPPORT REGISTRATION

40 CFR 158.15 -190 PRODUCT CHEMISTRY

63-6	Boiling Point (TGAI)	Data is required only if the technical material is a liquid at room temperature. Glyphosate is a solid.
63-18	Viscosity (MP)	Data is required if the material is a liquid. Glyphosate is a solid.
63-19	Miscibility (MP)	Data is required if the material is an emulsifiable liquid. Glyphosate is a water-soluble solid.
63-19	Miscibility (EP)	Data is required if the product is an emulsifiable liquid. Roundup herbicide is a ready-to-use liquid, not to be diluted.
63-21	Dielectric Breakdown Voltage (EP)	Data is required for liquid products that are used around electrical equipment. When Roundup is applied as a herbicide there is virtually no circumstance where it would be in contact with electrical equipment.

40 CFR 158.340 TOXICOLOGY

81-3	Inhalation LC50 - Rat (MP & TGAI)	Requirement waived by EPA on 1/5/88.
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Ingredient: Glyphosate				
Guideline Ref. Number	Guideline Study Name	MRID Number	Submitter	Status

81-6	Dermal Sensitization (MP)	Data is required if repeated contact with human skin is expected. Glyphosate is not used in a manner where such contact is likely.
81-7	Acute Delayed Neurotoxicity - Hen (TGAI)	Not required unless test material is an organophosphate, or a metabolite or degradation product which causes acetyl cholinesterase depression, or is structurally related to a substance that causes delayed neurotoxicity. Glyphosate does not trigger this.
82-3	90-Day Dermal (TGAI)	Data are needed if product used for purposeful dermal application to, or prolonged exposure of, human skin; or if pesticidal use will result in comparable exposure (e.g., swimming pool) or if other study criteria are met. Glyphosate does not trigger this
82-4	90-Day Inhalation - Rat (TGAI)	Data is required if the use may result in repeated inhalation exposure at a concentration likely to be toxic. The use pattern for glyphosate does not warrant this testing.
82-5	90-Day Neurotoxicity - Hen (TGAI)	Data is required if acute delayed neurotoxicity test showed neuropathy or neurotoxicity, or if closely related structurally to a compound which can induce these effects. Glyphosate does not cause acute neurotoxicity.
82-5	90-Day Neurotoxicity - Mammal (TGAI)	Data is required if acute oral, dermal or inhalation studies showed neuropathy or neurotoxicity. Glyphosate does not trigger this testing.
86-1	Domestic Animal Safety	Required on a case-by-case basis. The known properties of glyphosate and the registered uses do not warrant this testing.

40 CFR 158.490 WILDLIFE AND AQUATIC ORGANISMS

71-3	Wild Mammal Toxicity (TGAI)	Tests are required on a case-by-case basis depending on the results of lower tier studies such as acute and subacute testing, intended use pattern, and pertinent environmental properties. Results from other glyphosate studies have not triggered this.
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Signature <i>Diane Allemang</i>	Name and Title Diane Allemang, Vice President, Regulatory Affairs, Cheminova, Inc.; EPA Agent for Cheminova A/S	Date 6-27-2007
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Ingredient: Glyphosate		
Guideline Ref. Number	Guideline Study Name	MRID Number
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		Status

71-5 Simulated and Actual Field Testing -

Data are required on a case-by-case basis depending on the results of lower tier studies such as acute and subacute Mammals and Birds (TEP) testing, intended use pattern, and environmental properties. Results from other glyphosate studies do not trigger.

72-7 Simulated or Actual Field Testing - Aquatic Organisms (TEP)

Results of tier one and tier two studies with Roundup and glyphosate demonstrate that these materials have a low level of toxicity to aquatic species. Results from other studies have not triggered this requirement.

40 CFR 158.540 PLANT PROTECTION

121-1 Target Area Phytotoxicity (TEP)
123-1 Tier II Seed Germination / Seedling Emergence (TGA)
124-1 Tier III Terrestrial Field (TEP)
124-2 Tier III Aquatic Field (TEP)

Data are required only for Special Review and certain public health situations.
Required if >25% detrimental effect in one or more plant species was found in the corresponding Tier I test. Glyphosate does not trigger this requirement.
Required if >25% detrimental effect in one or more plant species was found in the corresponding Tier II test. Glyphosate does not trigger this requirement.
Required if >50% detrimental effect on any plant species was found in the corresponding Tier II test. Glyphosate does not trigger this requirement.

40 CFR 158.590 NONTARGET INSECT

141-2 Honeybee - Toxicity of Residues on Foliage (TEP)
151-5 Field Testing for Pollinators (TEP)

As data from acute study indicate very low toxicity, no further testing is required.
As data from acute study indicate very low toxicity, no further testing is required.

40 CFR 158.390 REENTRY PROTECTION

132-1 through 133-4

Glyphosate is applied to undesirable grass and broadleaf weeds to control or otherwise mitigate their growth or competition with crops, turf or ornamentals. It is unlikely that people would contact such treated vegetation on a regular or extended basis.

Signature

Diane Allemang

Name and Title

**Diane Allemang, Vice President, Regulatory Affairs,
Cheminova, Inc.; EPA Agent for Cheminova A/S**

Date

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40 CFR 158.290 ENVIRONMENTAL FATE

161-4	Photodegradation In Air (TGAI or PAIRA)	Waived by the Agency on May 15, 1992.
162-2	Anaerobic Soil (TGAI or PAIRA)	Not required if anaerobic aquatic metabolism study has been conducted.
163-2	Volatility - Lab (TEP)	Waived by the Agency on May 15, 1992.
163-3	Volatility - Field (TEP)	Waived by the Agency on May 15, 1992.
164-4	Combination and Tank Mixes	The Agency has not requested any specific studies. However, glyphosate tank mix residue data are available under the 40 CFR 158.240 Residue Data section of this data package.
164-5	Soil Dissipation, Long-Term (TEP)	Required if pesticide residues do not dissipate readily in soil. Glyphosate has a sufficiently short half-life in soil that this study has not been required.

40 CFR 158.240 RESIDUE CHEMISTRY

171-4	Food Handling (EP)	Data on residues in food or feed in food handling establishments are required whenever a pesticide is to be used in food/feed handling establishments. Glyphosate end-use products are not used in such establishments.
171-5	Reduction of Residue	Reduction of residue is required when the assumption of tolerance level residues results in an unsafe level of exposure. The registered uses of glyphosate do not trigger this requirement.

NR- Not required

Signature <i>Diane Allemang</i>	Name and Title Diane Allemang, Vice President, Regulatory Affairs, Cheminova, Inc.; EPA Agent for Cheminova A/S	Date 6-27-2007 83
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Date:	EPA Reg. No./File Symbol: 4787-26	Page 15 of 30		
Applicant's/Registrant's Name & Address: Cheminova A/S, c/o Cheminova, Inc., 1600 Wilson Blvd., Suite 700 Arlington, VA 22209		Product Glyphosate Technical		
Ingredient: Glyphosate				
Guideline Ref. Number	Guideline Study Name	MRID Number	Submitter	Status

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Signature <i>Diane Allemang</i>	Name and Title Diane Allemang, Vice President, Regulatory Affairs, Cheminova, Inc.; EPA Agent for Cheminova A/S	Date 6-27-2007
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Applicant's/Registrant's Name & Address: Cheminova A/S, c/o Cheminova, Inc., 1600 Wilson Blvd., Suite 700 Arlington, VA 22209	Product Glyphosate Technical	
Ingredient: Glyphosate		
Guideline Ref. Number	Guideline Study Name	MRID Number
		Submitter
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Signature <i>Diane Allemang</i>	Name and Title Diane Allemang, Vice President, Regulatory Affairs, Cheminova, Inc.; EPA Agent for Cheminova A/S	Date 6-27-2007 99
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Ingredient: Glyphosate				
Guideline Ref. Number	Guideline Study Name	MRID Number	Submitter	Status

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Signature <i>Diane Allemang</i>	Name and Title Diane Allemang, Vice President, Regulatory Affairs, Cheminova, Inc.; EPA Agent for Cheminova A/S	Date <i>6-27-2007</i> 100
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Ingredient: Glyphosate		
Guideline Ref. Number	Guideline Study Name	MRID Number
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Signature <i>Diane Allemang</i>	Name and Title Diane Allemang, Vice President, Regulatory Affairs, Cheminova, Inc.; EPA Agent for Cheminova A/S	Date <i>6-27-2007</i> 101
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Ingredient: Glyphosate				
Guideline Ref. Number	Guideline Study Name	MRID Number	Submitter	Status

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Signature <i>Diane Allemang</i>	Name and Title Diane Allemang, Vice President, Regulatory Affairs, Cheminova, Inc.; EPA Agent for Cheminova A/S	Date <i>6-27-2007</i> 102
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Ingredient: Glyphosate		
Guideline Ref. Number	Guideline Study Name	MRID Number

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Signature <i>Diane Allemang</i>	Name and Title Diane Allemang, Vice President, Regulatory Affairs, Cheminova, Inc.; EPA Agent for Cheminova A/S	Date <i>6-27-2007</i> 103
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Ingredient: Glyphosate				
Guideline Ref. Number	Guideline Study Name	MRID Number	Submitter	Status

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Signature <i>Diane Allemang</i>	Name and Title Diane Allemang, Vice President, Regulatory Affairs, Cheminova, Inc.; EPA Agent for Cheminova A/S	Date <i>6-27-2007</i> 104
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Ingredient: Glyphosate				
Guideline Ref. Number	Guideline Study Name	MRID Number	Submitter	Status

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Signature <i>Diane Allemang</i>	Name and Title Diane Allemang, Vice President, Regulatory Affairs, Cheminova, Inc.; EPA Agent for Cheminova A/S	Date <i>6-27-2007</i> 105
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Ingredient: Glyphosate		
Guideline Ref. Number	Guideline Study Name	MRID Number
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Signature

Diane Allemang

Name and Title

**Diane Allemang, Vice President, Regulatory Affairs,
Cheminova, Inc.; EPA Agent for Cheminova A/S**

Date

6-27-2007



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Ingredient: Glyphosate				
Guideline Ref. Number	Guideline Study Name	MRID Number	Submitter	Status

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Signature <i>Diane Allemang</i>	Name and Title Diane Allemang, Vice President, Regulatory Affairs, Cheminova, Inc.; EPA Agent for Cheminova A/S	Date 6-27-2007
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Applicant's/Registrant's Name & Address: Cheminova A/S, c/o Cheminova, Inc., 1600 Wilson Blvd., Suite 700 Arlington, VA 22209	Product Glyphosate Technical	
Ingredient: Glyphosate		
Guideline Ref. Number	Guideline Study Name	MRID Number
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Signature <i>Diane Allemang</i>	Name and Title Diane Allemang, Vice President, Regulatory Affairs, Cheminova, Inc.; EPA Agent for Cheminova A/S	Date 6-27-2007
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Date: EPA Reg. No./File Symbol: **4787-26** Page 26 of 30

Applicant's/Registrant's Name & Address:
**Cheminova A/S, c/o Cheminova, Inc., 1600 Wilson Blvd., Suite 700
Arlington, VA 22209**

Product **Glyphosate Technical**

Ingredient: **Glyphosate**

Guideline Ref. Number	Guideline Study Name	MRID Number	Submitter	Status
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Signature <i>Diane Allemang</i>	Name and Title Diane Allemang, Vice President, Regulatory Affairs, Cheminova, Inc.; EPA Agent for Cheminova A/S	Date 6-27-2007
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Ingredient: Glyphosate		
Guideline Ref. Number	Guideline Study Name	MRID Number
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Signature <i>Diane Allemang</i>	Name and Title Diane Allemang, Vice President, Regulatory Affairs, Cheminova, Inc., EPA Agent for Cheminova A/S	Date 6-27-2007 110
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Ingredient: Glyphosate		
Guideline Ref. Number	Guideline Study Name	MRID Number
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Signature <i>Diane Allemang</i>	Name and Title Diane Allemang, Vice President, Regulatory Affairs, Cheminova, Inc.; EPA Agent for Cheminova A/S	Date 6-27-2007 111
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Ingredient: Glyphosate				
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Signature <i>Diane Allemang</i>	Name and Title Diane Allemang, Vice President, Regulatory Affairs, Cheminova, Inc.; EPA Agent for Cheminova A/S	Date <i>6-27-2007</i> 112
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Guideline Ref. Number	Guideline Study Name	MRID Number
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Signature <i>Diane Allemang</i>	Name and Title Diane Allemang, Vice President, Regulatory Affairs, Cheminova, Inc.; EPA Agent for Cheminova A/S	Date 6-27-2007 113
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MONSANTO



MONSANTO COMPANY
800 NORTH LINDBERGH BLVD
ST. LOUIS, MISSOURI 63167
<http://www.monsanto.com>

13-Jun-2007

Document Processing Center
Office of Pesticide Programs (7504P)
U. S. Environmental Protection Agency
One Potomac Yard
2777 S. Crystal Drive, Room S4900
Arlington, VA 22202

Attention: Mr. James A. Tompkins
Team Leader (25)

**Subject: Letter of Authorization to Refer to Monsanto Glyphosate Data
Cheminova A/S (EPA Co No. 4787) and Cheminova Inc. (EPA Co. No. 67760)**

Dear Mr. Tompkins:

Monsanto Company (Monsanto) hereby grants Cheminova A/S and Cheminova Inc. (together, Cheminova) authorization to cite applicable Monsanto glyphosate registration data that have been submitted to EPA as of the date of this letter, including but not limited to safety, residue, environmental effects and efficacy data, to the extent specified below and solely for the uses described below. This letter supercedes, through expansion of the scope of the data that Cheminova may cite, any prior Letters of Authorization on file.

This authorization is granted solely for use within the U.S. in support of Cheminova's U.S. EPA registration(s) of Cheminova pesticides containing glyphosate, or any salt, ester, or other derivative of glyphosate, for use on or over-the-top of glyphosate tolerant soybean, corn, cotton, sugar beet or canola crops; for use on or over-the-top of other glyphosate tolerant crops other than Monsanto glyphosate tolerant crops; and for any and all conventional (*i.e.*, non-glyphosate tolerant) crop and non-crop uses. The authorization includes the right to refer to Monsanto's glyphosate product-specific product chemistry or product-specific acute toxicology data for glyphosate, glyphosate technical, isopropylamine salt of glyphosate, or ammonium salt of glyphosate to support registration of Cheminova's technical and manufacturing use products as defined in 40 CFR Sections 158.153(h) and (k) but not to support registration of Cheminova's end use products as defined in 40 CFR Section 152.3.

The following types of data are not included in Cheminova's data rights and are explicitly excluded:

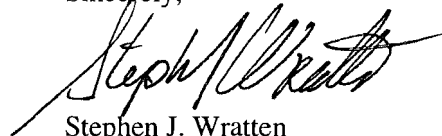
1. Data supporting the proposed use on Roundup Ready (glyphosate tolerant) creeping bent grass.
2. Any data supporting registrations of the potassium salt of glyphosate, its manufacturing-use products, or its end-use products, whether alone or in mixture with other pesticides.

This authorization includes the right of Cheminova to grant to its customers supplemental distribution rights for Cheminova's registered products for the uses described above and subject to the same restrictions and limitations contained herein.

This authorization is solely for the citation of data and does not authorize the release of these data or studies to Cheminova or any other party for either copying or viewing. Cheminova has no ownership interest whatsoever in any of Monsanto's data.

If you have any questions on this matter please feel free to contact me through Dr. Russell P. Schneider (202-383-2866), or by direct phone (314-694-1582), fax (314-694-4028), or electronic mail at stephen.j.wratten@monsanto.com.

Sincerely,



Stephen J. Wratten
Manager, Registrations

cc: R.P. Schneider
S. A. Adams

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